NHS
Buckinghamshire, Oxfordshire and Berkshire West
Integrated Care Board

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;	☐
Process **special-category data or criminal-offence data on a large scale**;	☐
Monitor a publicly accessible place on a large scale;	☐
Use **innovative technology** in combination with any of the criteria in the European guidelines;	✓
Carry out **profiling** on a large scale;	☐
Process biometric or genetic data in combination with any of the criteria in the European guidelines;	☐
Combine, compare or match data from multiple sources;	☐
Process personal data **without providing a privacy notice** directly to the individual in combination with any of the criteria in the European guidelines;	✓
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;	☐
Process **children's** personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them;	☐
Process personal data that could result in a **risk of physical harm** in the event of a security breach.	☐

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;	☐
Plan to do evaluation or scoring;	☐
Want to use systematic monitoring;	☐
Process sensitive data or data of a highly personal nature;	✓
Processing data on a large scale;	✓
Include data concerning vulnerable data subjects;	✓
Plan to use innovative technological or organisational solutions;	✓

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 :	10/08/2020
Title of the activity/processing:	BOB ICB Robotic Process Automation Pilot
Who is the person leading this work?	[redacted]
Who is the Lead Organisation?	BOB ICB
Who has prepared this DPIA?	[redacted]
Who is your Data Protection Officer (DPO)?	[redacted]
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).	Robotic Process Automation (RPA) is a digital automation process undertaken by 'robots' (bots) or software that mimics human actions. These are not physical robots, rather, they are simply programmes that do what they are told to do. RPA is a digital worker. It accesses systems and applications the same way a human does (with its own set of unique login credentials). The robots carry out processing in exactly the way they have been coded to do, defined by business rules and schedule established by process experts. This means that robots can create reports, enter or move data on systems, update dashboards, send emails, or indeed perform entire processes in the background. The primary purpose of robots is to support humans in the workplace by taking away mundane and repetitive tasks. This pilot is looking to automate high volume clinical filing tasks in primary care, the most prominent example being blood test results. The bots will check the test results, filing if normal and escalating if there is a reading which needs to be reviewed. The pilot scheme will run between 1st April 2023 to 30th September 2023. The DPIA is therefore being completed retrospectively.
Are there multiple organisations involved? (If yes – you can use this space to name them, and who their key contact for this work is)**.**	Yes. Aylesbury Central Primary Care Network Marcham Road Health Centre Brookside Group Practice White Horse Practice
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).	Not at currently time - pilot
Detail anything similar that has been undertaken before?	Not in BOB ICB but processes have been used elsewhere in the NHS. Within BOB ICB, RPA has been used at the Buckinghamshire Healthcare Trust to schedule/ reschedule appointments and the Royal Free Hospital, London, a leading exponent of providing RPA in the NHS

	Innovation and intelligent automation | Services A-Z | Services | The Royal Free

1. Categories, Legal Basis, Responsibility, Processing, Confidentiality, Purpose, Collection and Use

1.1.

What data/information will be used? Tick all that apply.	Tick or leave blank	**Complete**
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)	☐	1.2 but speak to your IG advisor first
Pseudonymised Data	☐	1.2 and consider at what point the data is to be pseudonymised
Anonymised Data	☐	Consider at what point the data is to be anonymised
Commercially Confidential Information	☐	Consider if a DPIA is appropriate
Other	☐	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**
	☐

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 (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).	**Tick or leave blank**
	☐

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 (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).	**Tick or leave blank**
	☐

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 (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).	**Tick or leave blank** ☐
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** ✓
What statutory power or duty does the Controller derive their official authority from? The ICB is established by order made by the NHS England under powers in the Health & Social Care Act 2022 sec 13 (2b i) with a general function for primary medical services in England	
f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY (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).	**Tick or leave blank** ☐
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 (Requirements for consent are the same as those detailed above in section 1.2, a))	**Tick or leave blank** ☐
b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION (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).	**Tick or leave blank** ☐
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 (Requirements for this are the same as those detailed above in section 1.2, d))	**Tick or leave blank** ☐
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	*NA*
e) The data has been made public by the data subject	*NA*
f) For legal claims or courts operating in their judicial category	*NA*
g) SUBSTANTIAL PUBLIC INTEREST (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).	**Tick or leave blank** ☐
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	**Tick or leave blank** ✓

PURSUANT TO CONTRACT WITH A HEALTH PROFESSIONAL AND SUBJECT TO CONDITIONS AND SAFEGUARDS (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).	
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 (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).	**Tick or leave blank** ☐
j) PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH ARTICLE 89(1) 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 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).	**Tick or leave blank** ☐

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**
Aylesbury Central PCN	Sole Controller
Marcham Road Health Centre	Sole Controller
Brookside Group Practice	Sole Controller
White Horse Practice	Sole Controller
BOB ICB	Other
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?

Practices are choosing selected areas for their own projects. The practices have proposed the following areas for automation in their bid documents:

1. Aylesbury Central PCN: checking test results and ordering repeat prescriptions, booking test slots, invitations for tests.
2. Marcham Road Health Centre: new patient registrations; patient self-bookings; filing of blood tests.

3. Brookside Group Practice: Path lab results
4. White Horse Practice: Diabetes Hba1C test results, path lab results

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 test results, e.g., blood test results, which are read by the bot and then filed on the GP's clinical record, e.g. EMIS or SystmOne

1.7.

How are you satisfying the common law duty of confidentiality?

Reasonable expectations – patient care

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

Provision of health care under GMS or PMS contract

1.8.

Are you applying any anonymization/pseudonymization 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.

n/a

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.

n/a

1.10.

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

GP Practice population

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.)

No data collection involved
No data collection involved
No data collection involved
Choose an item.
Choose an item.

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

Robotic process automation

1.12.

How will you edit the data?

Data will not be edited as RPA involves machine reading only. The documents that are read are stored on the GP clinical system as usual

1.13.

How will you quality check the data?

Suppliers will undertake audits of machine read data (read and evaluated by clinical staff) to check and approve results.

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.
There are risks associated with the pilot in terms of misread documents and data but this is taking place in a pilot environment. As above, machine read documents will be audited for accuracy. Failure of the bots will not result in a disruption to usual business practice and therefore contingency arrangements will not need to be activated.

1.15.
What training is planned to support this activity?
No training is provided to staff as it is an automated process on an electronic system. The bots are designed by the supplier to the practice specification. Faults with the bot are corrected by the supplier as a fully automated process.

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.
n/a

2.2.
What are the Data Flows? (Detail and/or attach a diagram if you have one).
Machine reading only – no new data flows are created.

2.3.
What data/information are you planning to share?
No patient data of any type pseudonymised, anonymised, etc. will shared between either the practices, nor the practices and the ICB. Project end stage reports will focus on the performance and accuracy of the bots

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
n/a

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

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?
No data will be shared – outputs of the pilot in terms of project learning will be shared, but this will not involve any personal, pseudonymized or anonymized data

2.6.
Why is this data/information being shared?
n/a

2.7.
How will you share it?
n/a

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
n/a

2.8.
What data sharing agreements are or will be in place?
Practices are conducting their pilots on an individual basis. There are no data sharing agreements between the individual pilot practices.

2.9.
What reports will be generated from this data/information?
No reports will be generated from the RPA – the automated filing process will not produce any stand-alone reports. Any outputs will be from GP clinical system under clinical staff control and will relate to the automatic reading and filing of documents in the same manner as human process.

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?
Yes

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

<u>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.</u>

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.

1. Aylesbury Central is using Hanley Consulting: The Home Office, Pennyroyal Ct, Station Rd, Tring, HP23 5QY
2. Marcham Road is using Jif Jaff: Aston House, Cornwall Ave, London, N3 1LF
3. Brookside Group is using Continuum Health (Anima)
4. White Horse is using RPA Health Ltd;) 86-90n Paul Street, London, EC2A 4NE

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
Hanley Consulting	Yes	PDF Registration Certificate - ZB51404

Automation Anywhere (Jif Jaff Ltd)	Yes	ZA453378
Continuum Health Ltd (Anima)	Yes	ZB035442
RPA Health	Yes	ZB344287
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
Hanley Consulting	DTAC
Automation Anywhere (Jif Jaff)	DTAC
Continuum Health (Anima)	DTAC
RPA Health	DTAC
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
Hanley Health	J8B1T	Standards met	25/05/2023
Automation Anywhere Ltd (Jif Jaff)	Z9I2E	Standards met	09/09/2022
Continuum Health (Anima)	R3U6M	Standards Met	23/06/2023
RPA Health	H4M31	Standards Met	04/04/2023
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).

Data will be stored in EMIS

3.6

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

Data will be accessed through the GP system (EMIS) with its control.

3.7

Is there any use of Cloud technology?

No

If yes add the details here.

Robots are designed and placed onto the system as a file extension. VPN links would be used to repair a bot in the event of breakdown, but no cloud technology is used to access or store patient data.

3.8

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

Security measures will include: a) access control with defined roles and responsibilities for all team and staff members on each project, including multi-factor authentication where applicable b) train staff in secure use of RPA bot functions to prevent vulnerabilities and undertake reviews of coding the development process to identify data flaws c) data encryption of data flows with secure protocols d) Utilise secure data storage for APIs e) Network security, i.e. firewalls, intrusion systems f) regular patching and updates to secure bots and operating systems

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.

N/a

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?

Suppliers involved in this pilot are from and are subject to the DVOFC IT framework which covers NHS DARS and data sharing arrangements.

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).

Practice privacy notice to be updated

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 as this is a robotic process. The GP's will process Individual Rights requests under current procedures.

4.3

How long is the data/information to be retained?

No data is retained in the robotic system.

Data in EMIS will be retained under individual GP retention policies.

4.4

How will the data/information be archived?

No individual output data is produced or archived from the robotic system however data stored in the GP system will be archived in line with the GP archive policy.

4.5

What is the process for the destruction of records?

No records are kept – any test results processed will be subject to the destruction procedure GP practices adhere to

4.6

What will happen to the data/information if any part of your activity ends?

If the activity ends the data will not be automatically/ robotically processed

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.

n/a

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**
Patient harm due to filing error of test result	Possible	Significant	Medium
Patient identifiable data exposed to third party provider	Possible	Significant	High
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.

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)**
Patient harm	Human review of automated test results	Eliminated	Low	No
Patient harm	Sample testing of automated test results	Reduced	Low	No
Patient identifiable data exposed to third party provider	On shore processing in line with full IG requirements	Reduced	Low	No
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?

RPA is a developmental area and test bots remain potentially subject to failure. However this is being conducted in a test environment where impacts of process and system failure are being monitored. As indicated above, test failure will not require the initiation of any business continuity arrangements

5.4

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

No additional comments

6. Consultation

6.1
Have you consulted with any external organisation about this DPIA?
No

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

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**	DPIA received: 20 October 2023 Risks noted in table 5.1 and after migration plan 5.2 the risks identified in table 5.1 have been classed as low. GP DPO comments: The Practice Privacy Notice to be updated: **Purpose:** The primary purpose of Robot Process Automation is to support humans in the workplace by taking away mundane and repetitive tasks. This pilot is looking to automate high volume clinical filing tasks in primary care, the most prominent example being blood test results. The bots will check the test results, filing if normal and escalating if there is a reading which needs to be reviewed. **Lawful basis of processing:** 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. I've have noted the security measures that needs to be adhered to as follows: Security measures will include: a) access control with defined roles and responsibilities for all team and staff members on each project, including multi-factor authentication where applicable b) train staff in secure use of RPA bot functions to prevent vulnerabilities and undertake reviews of coding the development

	process to identify data flaws c) data encryption of data flows with secure protocols d) Utilise secure data storage for APIs e) Network security, i.e. firewalls, intrusion systems f) regular patching and updates to secure bots and operating systems. BOB ICB DPO: **This DPIA covers the pilot project only** and the PCN/Practices listed above. Should any of those listed above, or a Practice not listed, wish to use the technology after the pilot is complete, a new or revised DPIA will be required.

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: [redacted] Date: 01/11/2023

Signed and approved on behalf of Click here to enter text.

Name:

Job Title:

Signature: 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.