

## 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 <b>profiling or automated decision-making</b> to make significant decisions about people or their access to a service, opportunity or benefit;	<input type="checkbox"/>
Process <b>special-category data or criminal-offence data on a large scale</b> ;	<input type="checkbox"/>
<b>Monitor a publicly accessible place</b> on a large scale;	<input type="checkbox"/>
Use <b>innovative technology</b> in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Carry out <b>profiling</b> on a large scale;	<input type="checkbox"/>
<b>Process biometric or genetic data</b> in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
<b>Combine, compare or match data</b> from multiple sources;	<input checked="" type="checkbox"/>
Process personal data <b>without providing a privacy notice</b> 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 <b>tracking</b> individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Process <b>children's</b> 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 <b>risk of physical harm</b> in the event of a security breach.	<input 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 checked="" 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 type="checkbox"/>
Processing data on a large scale;	<input checked="" type="checkbox"/>
Include data concerning vulnerable data subjects;	<input 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	
<b>Date of your DPIA :</b>	02/08/2022
<b>Title of the activity/processing:</b>	Thames Valley Cost of Living Research Project
<b>Who is the person leading this work?</b>	██████████
<b>Who is the Lead Organisation?</b>	BOB ICB
<b>Who has prepared this DPIA?</b>	██████████
<b>Who is your Data Protection Officer (DPO)?</b>	██████████
<b>Describe what you are proposing to do:</b> (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	<p>The Thames Valley Cost of Living Research Project is seeking to better understand the relatively high vacancy rate across the Frimley and BOB systems (FBOB) and to build on existing insight within the FBOB system and insights from the research undertaken to develop a number of strategic options to better attract, retain and deploy the workforce in light of the cost of living with a focus on recruitment, retention and other workforce models.</p> <p>Pricewaterhousecoopers LLP (PwC) would support to draw out the “so what” from research and develop a number of strategic options to better attract, retain and deploy the workforce in light of the cost of living. This is using already available data on turnover of staff and costs of recruitment &amp; retention, not using any personal data.</p> <p>A survey will be conducted by University of Huddersfield, for which staff participation is voluntary. Staff awareness and engagement will be undertaken by existing staff newsletters/emails sent by their employing organisation as part of business as usual communications. From the survey, for willing participants 1 to 1 interviews and workshops will be undertaken by the University.</p> <p>Data from the survey, interviews and workshops in anonymised format will be analysed by PWC for the final report.</p> <p>The options would be presented to the ICB boards in FBOB to support further action plans and place-based service decisions.</p> <p>PwC have worked closely with both ICBs as part of the temporary workforce project so understand both systems and some of the workforce issues already.</p>
<b>Are there multiple organisations involved?</b> (If yes – you can use this space to name them, and who their key contact for this work is).	Berkshire Healthcare NHS FT Buckinghamshire Healthcare NHS Trust Frimley Health FT Oxford Health FT Oxford University Hospitals FT Royal Berkshire FT South East Coast Ambulance Service FT South Central Ambulance Service FT Surrey and Borders Partnership FT

<b>Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA?</b> (If so then include the details here).	Click here to enter text.
<b>Detail anything similar that has been undertaken before?</b>	The temporary staffing programme <b>Customer Access Agreement Code: <u>TFORM/A/RDU/44405</u></b>

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

**1.1.**

<b>What data/information will be used?</b> Tick all that apply.	Tick or leave blank	<b>Complete</b>
Personal Data	<input checked="" type="checkbox"/>	1.2
Special Categories of Personal Data	<input type="checkbox"/>	1.2 AND 1.3
Personal Confidential Data	<input type="checkbox"/>	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 checked="" 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:	
<b>a) THE DATA SUBJECT HAS GIVEN CONSENT</b>	Tick or leave blank
	<input checked="" type="checkbox"/>
<b>Why are you relying on consent from the data subject?</b> Staff will voluntarily choose to complete the survey and participate in interviews and workshops on the understanding that the data they provide will be used by this activity.	
<b>What is the process for obtaining and recording consent from the Data Subject?</b> (How, where, when, by whom). Consent is recorded as part of the survey when staff participate. Staff also voluntarily give their contact details for further engagement.	
<b>Describe how your consent form is compliant with the Data Protection requirements?</b> (There is a checklist that can be used to assess this). This is a free choice for staff to participate. They can withdraw their participation with no effect on themselves. Once data has been collected whilst most items are not linked to an individual, they can raise a concern if they don't want something they have said in interview or workshop included.	
<b>b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY</b>	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).	
<b>What contract is being referred to?</b>	

Click here to enter text.	
<b>c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT</b> (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 <input type="checkbox"/>
<b>Identify the legislation or legal obligation you believe requires you to undertake this processing.</b> Click here to enter text.	
<b>d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON</b> (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 <input type="checkbox"/>
<b>How will you protect the vital interests of the data subject or another natural person by undertaking this activity?</b> Click here to enter text.	
<b>e) IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER</b> (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).	Tick or leave blank <input type="checkbox"/>
<b>What statutory power or duty does the Controller derive their official authority from?</b> Click here to enter text.	
<b>f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY</b> (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 <input type="checkbox"/>
<b>What are the legitimate interests you have?</b>	

Article 9 (2) conditions are as follows:	
<b>a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT</b> (Requirements for consent are the same as those detailed above in section 1.2, a))	Tick or leave blank <input checked="" type="checkbox"/>
<b>b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION</b> (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 <input type="checkbox"/>
<b>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</b> (Requirements for this are the same as those detailed above in section 1.2, d))	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
<b>g) SUBSTANTIAL PUBLIC INTEREST</b> (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 <input type="checkbox"/>
	Tick or leave blank

<p><b>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</b></p> <p>(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).</p>	<input type="checkbox"/>
<p><b>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</b></p> <p>(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).</p>	Tick or leave blank  <input type="checkbox"/>
<p><b>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 SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE FUNDAMENTAL RIGHTS AND THE INTERESTS OF THE DATA SUBJECT.</b></p> <p>(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).</p>	Tick or leave blank  <input type="checkbox"/>

**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
Berkshire Healthcare NHS FT, Buckinghamshire Healthcare NHS Trust, Frimley Health FT, Oxford Health FT, Oxford University Hospitals FT, Royal Berkshire FT, South East Coast Ambulance Service FT, South Central Ambulance Service FT Surrey and Borders Partnership FT	Sole Controller
Pricewaterhousecoopers LLP (PWC will not have any identifiable data and are not involved in the breadth of decision making required to make them a controller)	Other
University of Huddersfield	Processor
BOB ICB	Sole Controller
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?**

Pricewaterhousecoopers LLP (PwC) would support to draw out the “so what” from research and develop a number of strategic options to better attract, retain and deploy the workforce in light of the cost of living. This is using already available data on turnover of staff and costs of recruitment & retention, not using any personal data.

A survey will be conducted by University of Huddersfield, for which staff participation is voluntary. Staff awareness and engagement will be undertaken by existing staff newsletters/emails sent by their employing organisation as part of business as usual communications. From the survey, for willing participants, 1 to 1 interviews and workshops will be undertaken by the University.

Data from the survey, interviews and workshops in anonymised format will be analysed by PWC for the final report.

**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)

Survey responses

**1.7.**

**How are you satisfying the common law duty of confidentiality?**

No disclosure due to anon/pseudo actions

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

[Click here to enter text.](#)

**1.8.**

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

Yes

**If you are then describe what you are doing.**

Survey collection is anonymous save for voluntary provision of contact info for potential interview/workshops. Personal data used to manage/administer those will not be part of the response data shared with PWC for analysis.

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.**

This information will then be used to focus on drawing out the “so what” from research and developing a number of strategic options to better attract, retain and deploy the workforce in light of the cost of living. It is anticipated that the key data trends will be used to provide a high level view of the potential non-financial and cost benefits of potential strategic options and actionable countermeasures.

**1.10.**

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

1000 plus

**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.)

Web based data collection

Electronic form

By e-mail

Face to face - Video enabled

Choose an item.

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

[Click here to enter text.](#)

**1.12.**

**How will you edit the data?**

Data will not be edited

**1.13.**

**How will you quality check the data?**

Data Sources for recruitment/retention data are already published and QA'd in the publishing process. Survey design is set to ensure quality during collection (i.e. data field rules/validation).

**1.14.**

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

No

**If yes include in the risk section of this template.**

**1.15.**

**What training is planned to support this activity?**

No training identified

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

**2.1.**

**Are you proposing to combine any data sets?**

Yes

**If yes then provide the details here.**

There are four data sources. The aggregated data on turnover/recruitment/retention, the anonymous staff survey responses, interview records and workshop output. Personal data will only be used, with consent for contact and participation in interviews and workshops. The outputs from those will be anonymous.

There will not be any combining of datasets at an individual level and no data contains a key to do that. There will be a degree of combining data as part of the analysis in the report.

**2.2.**

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

Staff complete the survey and responses are provided (anonymous) to PWC. In addition anonymous output of interviews & workshops will be gathered by the University and shared with PWC

**2.3.**

**What data/information are you planning to share?**

Trusts will share existing aggregated turnover, recruitment & retention information. Participants will share their responses to surveys, interviews & workshops (anonymised)

**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?**

Pricewaterhousecoopers LLP

**2.6.**

**Why is this data/information being shared?**

To assist in the provision of solution scenarios for the benefit of the Thames Valley Cost of Living Research Project

**2.7.**

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

The data will only be sent via email and or shared on Teams (following collection via survey forms and interviews/workshops)

**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**

Only invited members of the Thames Valley Cost of Living Research Board will have access to the Teams area used to store all documentation and information.

**2.8.**

**What data sharing agreements are or will be in place?**

The data sharing is anonymised data so no DSA required.

**2.9.**

**What reports will be generated from this data/information?**

The data will inform solution scenarios and will not form a report on their own

**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?**

No

**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.**



Pricewaterhousecoopers LLP, 1 Embankment Place  
 London, WC2N 6RH  
 University of Huddersfield  
 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
Pricewaterhousecoopers LLP	Yes	Registration Reference: Z7486412
University of Huddersfield	Yes	Z6534300
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
Pricewaterhousecoopers LLP	No personal data utilised. Service contract in place – standard T&Cs
University of Huddersfield	Research Ethics (ICB & University Committee)
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
Berkshire Healthcare	RWX	21/22 Standards Exceeded	30/6/2022
Buckinghamshire Healthcare	RXQ	21/22 Standards not met	30/6/2022
Frimley Health Ft	RDU	21/22 Approaching standards	30/6/2022
Oxford Health FT	RNU	21/22 Standards met	14/7/2022
Oxford University Hospitals	RTH	21/22 Standards met	30/6/2022
Royal Berkshire FT	RHW	21/22 Standards met	17/6/2022
South East Coast Ambulance Service	RYD	21/22 Approaching standards	29/6/2022
South Central ambulance Service	RYE	21/22 Approaching standards	30/6/2022

Surrey and Borders Partnership	RXX	21/22 Standards met	30/6/2022
<p><b>3.5</b>  <b>How and where will the data/information be stored?</b> (Consider your answer to 2.7 and the potential storage of data in any online meeting or networking solution).  The data will be held by the owning Trust and shared in an anonymised form via email, until that point it will be stored within their systems. All information held by the Thames Valley Cost of Living Research Board will be stored on Teams. Survey information will be held by the University of Huddersfield in secure storage.</p>			
<p><b>3.6</b>  <b>How is the data/information accessed and how will this be controlled?</b>  Data will be stored on MS Teams and accessed by the relevant parties (PWC, ICBs) on the MS Teams site. The University will be the only party able to access the limited personal data used in this exercise.</p>			
<p><b>3.7</b>  <b>Is there any use of Cloud technology?</b>  Yes  <b>If yes add the details here.</b>  MS Teams</p>			
<p><b>3.8</b>  <b>What security measures will be in place to protect the data/information?</b>  Data will be password protected – for items such as lists of staff who agree to participate in interviews and workshops.  <b>Is a specific System Level Security Policy needed?</b>  No  <u>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.</u></p>			
<p><b>3.9</b>  <b>Is any data transferring outside of the UK?</b> (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  <b>If yes describe where and what additional measures are or will be in place to protect the data.</b>  <a href="#">Click here to enter text.</a></p>			
<p><b>3.10</b>  <b>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?</b>  NHS Standard contract in place with University of Huddersfield, arranged by Frimley Procurement service</p>			
<p><b>4. Privacy Notice, Individual Rights, Records Management, Direct Marketing</b></p>			
<p><b>4.1</b>  <b>Describe any changes you plan or need to make to your Privacy Notice and your proposed completion date?</b> (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).  No changes to organisational privacy notices. Staff will be made aware via organisational BAU comms to staff about the opportunity to participate in the survey and any further engagement for interviews &amp; workshops will also inform staff how their responses will be used.</p>			
<p><b>4.2</b>  <b>How will this activity impact on individual rights under the GDPR?</b> (Consider the right of access, erasure, portability, restriction, profiling, automated decision making).  No impact – individuals can withdraw participation</p>			
<p><b>4.3</b>  <b>How long is the data/information to be retained?</b></p>			

The data will be held for the duration of the project which is currently due to complete by end March 2023, after this time it will be destroyed with only the solution scenarios remaining.

**4.4**  
**How will the data/information be archived?**  
 The data will be held for the duration of the project which is currently due to complete by end March 2023, after this time it will be destroyed with only the solution scenarios remaining

**4.5**  
**What is the process for the destruction of records?**  
 Contact details of participants for interviews and workshops will be deleted by the end of the project if not before.

**4.6**  
**What will happen to the data/information if any part of your activity ends?**  
 Data will be deleted at the end of the project – end date 31<sup>st</sup> March 2023

**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. <small>(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)).</small>	Likelihood of harm	Severity of harm	Overall risk
Breach of confidentiality internal	Remote	Minimal	Low
Breach of confidentiality external	Remote	Minimal	Low
Loss of data (to the programme)	Remote	Minimal	Low
Poor quality data	Possible	Minimal	Low
Unlawful processing of data	Remote	Minimal	Low
Excessive processing	Remote	Minimal	Low

**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)
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.

**5.3**

**What if anything would affect this piece of work?**

N/A

**5.4**

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

[Click here to enter text.](#)

## 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.**

[Click here to enter text.](#)

**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**

[Click here to enter text.](#)

## 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**

<b>Residual risks and nature of potential impact on individuals.</b> (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)).	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
<a href="#">Click here to enter text.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>

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

<b>Risk</b>	<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved (SIRO)</b>
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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: 09/12/2022

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.

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.