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 :	12/05/2023
Title of the activity/processing:	Oxford Health NHS Foundation Trust (OHFT) transfer of the Continuing Health Care (CHC) team and service to the Integrated Care Board (ICB), Buckinghamshire, Oxfordshire and Berkshire West (BOB)
Who is the person leading this work?	[redacted] (SRO), Director of Vulnerable People
Who is the Lead Organisation?	Buckinghamshire, Oxfordshire and Berkshire West ICB
Who has prepared this DPIA?	[redacted], Assistant Director of All Age Continuing Care
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).	To enable the CHC to continue delivering the service when the contract is transferred to the ICB on 1/7/23, patient and related data and information is required. Currently the data and information are stored on systems owned or contracted by OHFT, which will need to be transferred with the contract. It is anticipated that 2 data sets will be shared in relation to patient information: 1. Patient information and data from Broad Care 2. QA database will be transferred to give access to historical information as well as the CHC G drive, which contains patient information and team resources. The patient data transfer and OHFT staff transferring to ICB under TUPE is included in a separate DPIA completed by OHFT.
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 – BOB ICB, NHS England, relevant Local Authorities, Relevant Care providers, CHS (Broadcare) and QA
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).	Click here to enter text.
Detail anything similar that has been undertaken before?	Yes, OHFT service transfer from previous provider.

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 — Tick or leave blank: ☐

(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: ✓

(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.
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

d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON — Tick or leave blank: ☐

(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: ✓

(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?
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	
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 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).	**Tick or leave blank** ✓
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.	**Tick or leave blank** ☐

(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
CHS (Broadcare)	Processor
QA	Processor
BOB ICB	Joint Controller
NHS England	Joint Controller
Relevant Local Authorities	Joint Controller
Relevant Care Providers	Joint Controller
Oxford Health Foundation Trust (OHFT)	Other

1.5.

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

To enable the CHC to continue delivering the service when the contract is transferred to the ICB on 1/7/23, patient and related data and information is required. Currently the data and information are stored on systems owned or contracted by OHFT, which will need to be transferred with the contract.

It is anticipated that the following data sets will be shared in relation to patient information:
1. Patient information and data from Broad Care
2. QA database will be transferred to give access to historical information
3. OHFT G drive folders, read only access will be made available to the CHC Team for 6 months post transfer.
OHFT CHC data in SharePoint, Emails and One Drive can be forwarded to the CHC Team ICB NHS.net accounts if the accounts are available one week prior to the 1st July 2023 on a strictly relevant and necessary basis.
Access to OHFT clinical systems is approved and a Data Sharing Agreement will be in place.

Data will include:
Name
Address
Personal contact numbers
DOB
Age
Healthcare history – current and retrospective
CHC assessments and relevant evidence used in assessments that determine funding eligibility and support future assessments
Religious or philosophical beliefs
Genetic data.
Nationality

Ethnic Origin
Disability
Financial information (for Personal Health Budgets (PHB) with Direct Payments)

The data and information needs to be available to ensure patients care is delivered safety and in line with CQC regulations. Liaison between other agencies and third parties as appropriate to deliver and set up care and treatment.

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
Financial Records (in relation to PHB Direct Payments)

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

See 1.2 c above

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.

Reporting submissions to NHS England are currently anonymised for publication within the National data set.

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.

Assessment of eligibility and onward commissioning, care planning and review of patient care.

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.)

By telephone
By e-mail
Electronic form
Face to face - in person
Face to face - Video enabled
Paper

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

1.12.

How will you edit the data?

CHC Team members will input and document as appropriate in collaboration with the individual and other health and social care professionals. Information can be gathered from a number of sources (Local Authorities, Care providers, Primary and Secondary Health care providers, family and friends etc.)

1.13.

How will you quality check the data?

OHFT is responsible for ensuring data quality prior to the transfer. From 1st July the ICB process involves collating and considering all relevant data in a joint process with the patient at the centre which should support quality assurance.

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?

Staff are being transferred into the ICB and will be using the same systems they had in OHFT so should already be trained in their use.

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).

Referrals are sent to the ICB CHC Team by any Health & Social Care professional, patients can also self-refer. Referrals are sent by email, post or telephone. The CHC team share with relevant Health & Social Care organisations and patients or advocates verbally and by MS Teams. CHC process and outcomes including financial data is uploaded for anonymised publication via NHS England. Full details are shared with Local Authorities, Commissioners and Providers. Patient data is logged on Broadcare.

2.3.

What data/information are you planning to share?

Data will include:
Name
Address
Personal contact numbers
DOB
Age
Healthcare history – current and retrospective
CHC assessments and relevant evidence used in assessments that determine funding eligibility and support future assessments
Religious or philosophical beliefs
Genetic data.
Nationality
Ethnic Origin
Disability
Financial information (for Personal Health Budgets (PHB) with Direct Payments)

The data will be shared by the ICB with relevant parties and some will be anonymised whilst some will not. For example, CHC process and outcomes including financial data is uploaded for anonymised publication via NHS England and NHS Digital but full details are shared with local authorities, commissioners and providers as part of the assessment and review process and subsequent provision requirements.

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?

The data will be shared by the ICB with relevant parties and some will be anonymised whilst some will not. For example, CHC process and outcomes including financial data is uploaded for anonymised publication via NHS England and NHS Digital but full details are shared with local authorities, commissioners and providers as part of the assessment and review process and subsequent provision requirements.

2.6.
Why is this data/information being shared?
The ICB will need to share with relevant bodies to enable the assessment and review process as well as subsequent commissioning and procurement requirements.

2.7.
How will you share it? (Consider and detail all means of sharing)

By telephone
By e-mail
Electronic form
Face to face - in person
Face to face - Video enabled
Paper

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
All staff are required to undertake annual IG training and apply their learning. No MS Teams meetings sharing personal data are recorded.

2.8.
What data sharing agreements are or will be in place?
Not applicable

2.9.
What reports will be generated from this data/information?

Reporting submissions to NHS England are currently anonymised for publication within the National data set. Assessments and reviews of eligibility including use for onward commissioning, care planning and review of patient care.

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.
CHS Healthcare Ltd, 1 Wrens Court, 53 Lower Queen Street, Sutton Coldfield, West Midlands, B72 1RT and QA Plus Ltd, Stadium House, Oldbury Road, Cwmbran, Torfaen, NP44 3JU
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 expires 18/07/2023
OHFT	Yes	Z1411013 expires 07/08/2023
CHS Healthcare (Broadcare)	Yes	ZA060874 expires 15/07/2023
QA Plus Limited	Yes	ZA028537 expires 11/11/2023
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
OHFT	DSP Toolkit compliance, contract management

CHS Healthcare (Broadcare)	DSP Toolkit compliance, contract management
QA Plus Limited	Hosted by the ICB IT Provider – SCW CSU
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	Standards Exceeded	27 June 2023
OHFT	RNU	Standards Met	14/07/2022
CHS Healthcare (Broadcare)	8HN55	Standards Met	29/06/2022
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).

Data will be stored on shared drives, Broadcare, QA+ and temporarily on emails

3.6

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

Shared drives, Broadcare and QA+ have limited access with sign in requirements and email has higher levels of limitation to access.

3.7

Is there any use of Cloud technology?

Yes

If yes add the details here.

Broadcare within HSCN network

3.8

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

The CHC Teams User and Team data and the systems QA+ and MESH will be migrated to the BOB's network domain managed by BOB's IT provider SCW in their secure NHS Cyber essentials compliant Data Centres. Broadcare is a cloud-based system, within HSCN network.

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?

Berkshire West
Mental Health Contra

The Broadcare Data Processing Agreement (see BW version) will be in place.

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).

No changes 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).

BOB ICB will manage in line with their Individual Rights Policy.

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 the ICB's Records Management Policy

4.5

What is the process for the destruction of records?

In line with the destruction process in the ICB's Records Management Policy and IT policies.

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**
There is an inherent risk of inaccurate data entry.	Possible	Significant	Medium
There is a risk of availability and unauthorised access as data has been	Possible	Significant	Medium

historically saved and stored on OHFT network drive, SharePoint, One Drive and emails			
There is a risk that the data transfer creates inaccuracies that impact data quality.	Possible	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)
There is a risk of availability and unauthorised access as data has been historically saved and stored on OHFT network drive, SharePoint, One Drive and emails.	OHFT have agreed access to G drive folders, read only access will be made available to the CHC Team for 6 months post transfer. OHFT CHC data in SharePoint, Emails and One Drive can be forwarded to the CHC Team ICB NHS.net accounts if the accounts are available one week prior to the 1st July 2023 on a strictly relevant and necessary basis. A SOP will be prepared for managing filing/storage.	Eliminated	Low	Yes
There is an inherent risk of inaccurate data entry.	Ensure all Mandatory and Statutory Training is up to date. Holding a face-to-face meeting/Q&A session with the team has been agreed.	Tolerated	Medium	Yes
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?

Loss of, or access to, records would create additional burden on the team and possible reputational and/or financial risk but should not prevent the transfer itself.

5.4

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

The CHC Team have access to other systems in order to fulfil the service requirements. All access has been appropriately approved and access controlled. Please see embedded document below.

CHC System Access.docx

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 to ensure correct pre transfer data processes captured accurately.

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	After conversation with the SIRO, it has been agreed to accept the risks as this is an essential piece of work and time limited.

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.
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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: Governance Manager and Data Protection Officer

Signature: [redacted] Date: 29/06/2023

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.