

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.

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

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

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

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

Background Information	
Date of your DPIA :	18/04/2023
Title of the activity/processing:	Positive Behaviour Support functional assessments
Who is the person leading this work?	██████████
Who is the Lead Organisation?	ICB
Who has prepared this DPIA?	██████████
Who is your Data Protection Officer (DPO)?	██████████
Describe what you are proposing to do: (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	<p>Referrals for assessment identify mental health needs for Children and Young People with a Learning Disability were previously sent to South London and Maudsley as there is no Learning Disability Child and Adolescent Mental Health Service within Berkshire West. Due to capacity, they could no longer assess these children and young people.</p> <p>Following consultation from Oxfordshire Health Learning Disability Child and Adolescent Mental Health Service advice was given that a Positive Behaviour Functional assessment to determine the work for these children and young people was required. These Children and Young People have been identified of requiring an assessment by Special schools within Berkshire West, Paediatric Consultant for Neurodiversity at the Royal Berkshire Hospital and the Local authorities within Berkshire West.</p> <p>Positive Behaviour Support UK(PBSUK) were identified as the service to complete the assessments as they were previously completing the assessments on an individual basis following referrals from the above.</p> <p>The project is to involve patient records being transferred from Berkshire Healthcare Foundation Trust, Royal Berkshire Hospital Foundation Trust, Special Schools within Berkshire and the three local authorities within Berkshire West to Positive Behaviour Support UK for assessment. PBSUK will complete a full assessment of these Children and Young People and work offer the correct support to reduce the risk of Children and Young People being admitted to a mental health hospital.</p> <p>PBSUK already provide this service to other NHS ICB's in the area.</p>
Are there multiple organisations involved? (If yes – you can use this space to name them, and who their key contact for this work is).	<ul style="list-style-type: none"> • Royal Berkshire Healthcare Foundation Trust • Berkshire Healthcare Foundation Trust • Special schools within Berkshire, Wokingham Borough Council • Brighter Futures for Children, West Berkshire Borough Council • Positive Behaviour Support UK,

	<ul style="list-style-type: none"> Buckinghamshire, Oxfordshire and Berkshire West ICB and Berkshire West Place.
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).	None
Detail anything similar that has been undertaken before?	None

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

1.1.

What data/information will be used?	Tick or leave blank	Complete
Tick all that apply.		
Personal Data	<input checked="" type="checkbox"/>	1.2
Special Categories of Personal Data	<input checked="" type="checkbox"/>	1.2 AND 1.3
Personal Confidential Data	<input checked="" 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 checked="" type="checkbox"/>	1.2 and consider at what point the data is to be pseudonymised
Anonymised Data	<input type="checkbox"/>	Consider at what point the data is to be anonymised
Commercially Confidential Information	<input type="checkbox"/>	Consider if a DPIA is appropriate
Other	<input type="checkbox"/>	Consider if a DPIA is appropriate

1.2.

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

Article 6 (1) of the GDPR includes the following:	
a) THE DATA SUBJECT HAS GIVEN CONSENT	Tick or leave blank <input type="checkbox"/>
Why are you relying on consent from the data subject?	
What is the process for obtaining and recording consent from the Data Subject? (How, where, when, by whom). Click here to enter text.	
Describe how your consent form is compliant with the Data Protection requirements? (There is a checklist that can be used to assess this). Click here to enter text.	
b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY	Tick or leave blank <input type="checkbox"/>
(The contract needs to be between the Controller and the individual and not concern data being processed due to someone else having a contract with the Controller. Processing can happen before the contract is entered into e.g. processing a pre-health assessment for a private or cosmetic procedure that is a paid for service with the delivery of that care done under contract between the Patient and the Practitioner).	
What contract is being referred to? Click here to enter text.	
c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT	Tick or leave blank <input type="checkbox"/>
(A legal obligation mandates processing of data as a task in itself where there are likely to be legal measures available if not adhered to e.g. an Employer has a legal obligation to disclose salary information to HMRC).	

Identify the legislation or legal obligation you believe requires you to undertake this processing. Click here to enter text.	
d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON (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"/>
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 (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 ✓
What statutory power or duty does the Controller derive their official authority from? ICB are required to provide this service for Children and Young People to meet their health needs, under the NHS Act 2012	
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 <input type="checkbox"/>
What are the legitimate interests you have? Click here to enter text.	
Article 9 (2) conditions are as follows:	
a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT (Requirements for consent are the same as those detailed above in section 1.2, a))	Tick or leave blank <input type="checkbox"/>
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 <input type="checkbox"/>
c) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON WHERE THEY ARE PHYSICALLY OR LEGALLY INCAPABLE OF GIVING CONSENT (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
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 <input type="checkbox"/>
h) PROCESSING IS NECESSARY FOR THE PURPOSES OF PREVENTIVE OR OCCUPATIONAL MEDICINE, FOR THE ASSESSMENT OF THE WORKING CAPACITY OF THE EMPLOYEE, MEDICAL DIAGNOSIS, THE PROVISION OF HEALTH OR SOCIAL CARE OR TREATMENT OR THE MANAGEMENT OF HEALTH OR SOCIAL CARE SYSTEMS AND SERVICES ON THE BASIS OF UNION OR MEMBER STATE LAW OR	Tick or leave blank ✓

<p>PURSUANT TO CONTRACT WITH A HEALTH PROFESSIONAL AND SUBJECT TO CONDITIONS AND SAFEGUARDS</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>	
<p>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</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>	<p>Tick or leave blank</p> <p><input type="checkbox"/></p>
<p>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.</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>	<p>Tick or leave blank</p> <p><input type="checkbox"/></p>

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 be involved/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 Foundation Trust	Sole Controller
Special schools within Berkshire. The Avenue School, The Castle School, Brookfields School and Addington School	Sole Controller
Royal Berkshire Hospital Foundation Trust	Sole Controller
Berkshire West Children's social care, Brighter for Children, Woking Borough Council Children's Social Care	Sole Controller
Positive Behaviour Support UK	Processor
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?

The information which is being sent are patient records detailing diagnosis and what support has previously been offered to the Child/Young Person and their parent/carers from Berkshire Healthcare Foundation Trust and Royal Berkshire Hospital Foundation Trust. Information will also describe behaviours of the Child/Young Person in school and within home, to be sent by the Local Authorities and Special Schools within Berkshire, to

allow for Positive Behaviour UK to complete a holistic assessment. Functional Behaviour Assessments are person specific and require a thorough understanding of the individual. It would not be possible to conduct this work anonymously.” Information from PBSUK.

The ICB will not be receiving any patient data. The data to ICB will be pseudonymised to allow payment only.

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 sent by Berkshire Healthcare Foundation Trust and Royal Berkshire Hospital Foundation Trust.
Education records sent by the special schools in Berkshire.
Social care records sent by the Local authorities within Berkshire West

1.7.

How are you satisfying the common law duty of confidentiality?

Consent - Implied

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

ICB receives request for payments only and does not require consent or any information about treatment.

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.

ICB receives pseudonymised data from PBSUK (request for payment) in order to make payments such as NHS number included in the invoices.

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

ICB only facilitating payment for the services carried out by PBSUK not direct care to the patients.

1.10

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

11 to 50

1.10.

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.)

Electronic form

By e-mail

By e-mail

Choose an item.

Choose an item.

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

[Click here to enter text.](#)

1.11.

How will you edit the data?

Data will not be edited by PBSUK it is sent to them so they can see what support has previously been offered in relation to the Child/Young Person and their parents/carers.

ICB will receive invoices from PBSUK so that payments are made for services provided.

1.12.

How will you quality check the data?

PBSUK service will check availability of information which will enhance their assessment of the child and young person. ICB will not carry out any other checks other than making payment.

1.13.

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.

1.14.

What training is planned to support this activity?

No training is required for this activity within ICB.

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.

The data from Berkshire Healthcare Foundation Trust, Royal Berkshire Hospital Foundation Trust, Special schools within Berkshire and the 3 local authorities within Berkshire West will be combined by PBSUK to allow for PBSUK to complete a thorough assessment. Once assessment is carried out, invoices are then issued to ICB for payments.

2.2.

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

Berkshire Healthcare Foundation Trust, Royal Berkshire Hospital Foundation Trust will be using {secure} feature of NHS mail, the 3 Local Authorities within Berkshire West and the Special Schools within Berkshire will send data to PBSUK using secure email, as directed within their organisation and documents will be password protected.

PBSUK will do the report and send one assessment to BHFT, RBHFT, Special Schools within Berkshire and the Local authorities within Berkshire West.

PBSUK will send a breakdown of costings to ICB using the NHS number for payment purposes only.

The emails will be sent to a dedicated senior member of PBSUK as the main contact for contract of access.

2.3.

What data/information are you planning to share?

1. Assessment report from Royal Berks Hospital
2. Assessment from special schools listed here only.
3. Assessment from Local authorities listed here only.
4. ICB payments/invoices between ICB and PBSUK

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 adds 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?

Berkshire Healthcare Foundation Trust, Royal Berkshire Hospital Foundation Trust, the 3 Local Authorities within Berkshire West and the Special Schools within Berkshire will send data to PBSUK and ICB payments/invoices team.

[Click here to enter text.](#)

2.6.

Why is this data/information being shared?

Functional Behaviour Assessments are person specific and require a thorough understanding of the individual. It would not be possible to conduct this work anonymously." The information is required to provide treatment to the patients. Information from PBSUK (direct care to patients)

The information is shared with ICB to make payments for services rendered to patients.

2.7.

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

Referrals will be sent to PBSUK using secure emails [secure], as directed by each organization, to PBSUK using password protection using egress system. PBSUK will request documents sent from special schools and local authorities are password protected. Each organization will ensure that all electronic data sent using the [secure] email and, where appropriate, password protected. Data will be stored in a secure manner using firewalls, malware and anti-virus technologies as appropriate. If necessary, a secure, centralized server facility can be set up by IT practitioners. If that is required, arrangements could be made, if deemed necessary, to have penetration tests undertaken for that on request.

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

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

[Click here to enter text.](#)

2.8.

What data sharing agreements are or will be in place?

There is no data sharing agreement in place at present. This is a one-off piece of work whilst the Learning Disability CAMHS is being mobilised with Berkshire Health

2.9.

What reports will be generated from this data/information?

No information/data will be generated from this information this is only for PBSUK to form part of their assessment to see what work has already been carried out with the families and the diagnosis of the Child/Young Person

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.

Positive Behaviour Service UK 24 Lauder Crescent, Perth, PH1 1SU

Registration reference number ZA196510

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
PBSUK	Yes	Registration reference ZA196510 registered 25/7/2016 expires 24/7/23
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
PBSUK 24 Lauder Crescent, Perth, PH1 1SU	There is no NHS contract in place. This would come under individual funding requests, where our partner agencies and providers request health funding for services for individual Children and Young People via the Childrens Funding Panel.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.

3.4

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

PBSUK do not currently have a Data Security Protection Toolkit. They have contacted DSP and have requested a code to enable them to register. Once they are registered, they will inform the ICB of their status.

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
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.
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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 shall be held for the duration of the engagement and thereafter, unless otherwise agreed in writing, shall be held for a period of 12 months to enable follow up discussions and effective handover to any successor provider. Thereafter it shall be deleted from our systems.

All our computers are password protected, as are many of our documents where the content requires such care. All computers are kept up to date with suitable anti-virus and malware protection.

3.6

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

Data will be accessed via password protected folders send via emails, it will be accessed by senior managers and leads of each organisation.

PBSUK staff and associated are fully aware of their and our obligations under the Act and are used to dealing with sensitive data in their day-to-day work.

3.7

Is there any use of Cloud technology?

No

If yes add the details here.

Click here to enter text.

3.8

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

All PBSUK computers are password protected, as are many of our documents where the content requires such care. All computers are kept up to date with suitable anti-virus and malware protection.

Is a specific System Level Security Policy needed?

No

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.

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?

There is currently no data sharing agreement in place between PBSUK and service providers.

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

4.1

Describe any changes you plan or need to make to your Privacy Notice and your proposed completion date?

(There is a checklist that can be used to assess the potential changes required or if you wish for it to be reviewed then add the link below).

None

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).

PBSUK will respond to individual rights requests as per data protection regulation usual process.

4.3

How long is the data/information to be retained?

Data shall be held for the duration of the engagement and thereafter, unless otherwise agreed in writing, shall be held for a period of 12 months to enable follow up discussions and effective handover to any successor provider. Thereafter it shall be deleted from PBSUK systems.

Payment records from ICB will be retained according to the ICB records management policy.

4.4

How will the data/information be archived?

The information will be archived on PBSUK computers which are password protected and held for a period of 12 months. ICB will archive data according to records management policy.

4.5

What is the process for the destruction of records?

PBSUK will at end of the agreement return paper records to the authority or his representatives or destroyed securely by-passing data and all relevant material to an accredited service for certified shredding. Data from our systems shall be deleted by our IT support practitioners.

4.6

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

PBSUK will at end of the agreement return paper records to the authority or his representatives or destroyed securely by-passing data and all relevant material to an accredited service for certified shredding. Data from PBSUK systems shall be deleted by IT support practitioners in accordance to records management policies.

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
Data is not sent securely with patient identifiable information	Remote	Severe	Medium
Data is shared with wrong person/e-mail	Possible	Significant	Medium
No contract in place	Possible	Severe	Medium
No data agreement in place	Possible	Severe	Medium

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)
Data is sent to wrong person	Reducing risk using each organisation [secure] email processes and cross checking to correct recipient	Reduced	Low	Choose an item.
Data is not sent securely	Reducing risk with each organisation using their own [secure] email processes	Reduced	Low	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

5.3

What if anything would affect this piece of work?

If anything affects this project or PSBUK involvement can be terminated and all processes followed as per ICB contract withdrawal/cancellation procedures.

[Click here to enter text.](#)

5.4

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

none

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

On the basis the IG team will follow up on registration by PBSUK for the Data Security and Protection Toolkit and this is a one of piece of work whilst Learning Disability CAMHS service is put in place in Berkshire Health.

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.
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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.

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.