

**Ref- 23/24-018**

## 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 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 type="checkbox"/>            |
| Plan to do evaluation or scoring;                                 | <input type="checkbox"/>            |
| Want to use systematic monitoring;                                | <input checked="" 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 checked="" 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>  | 13/12/2023  |
| <b>Title of the activity/processing:</b>  | FOI "Infreemation" system implementation  |
| <b>Who is the person leading this work?</b>   | ██████████, Governance Manager  |
| <b>Who is the Lead Organisation?</b>  | BOB ICB   |
| <b>Who has prepared this DPIA?</b>  | ██████████, Governance Support Manager  |
| <b>Who is your Data Protection Officer (DPO)?</b>   | ██████████, DPO and Governance Manager  |
| <p><b>Describe what you are proposing to do:</b><br/>           (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).</p> | <p>Procure and implement a system to receive and process information and data in relation to the processing of Freedom of Information requests. The system will contain information reported to the BOB ICB FOI team.</p> <p>There has been a significant increase in the number of FOI requests. We need a case management system because:</p> <ol style="list-style-type: none"> <li>1. Time will be saved making us more efficient e.g., all case notes (documents, emails, log acknowledgments and responses) will be in one place and easier to track.</li> <li>2. Other cost savings anticipated:               <ul style="list-style-type: none"> <li>• Standardising the logging of cases and automated data capture</li> <li>• Allocating tasks and deadlines to employees with easy oversight of all cases</li> <li>• A full audit trail will be automatically created.</li> <li>• A database should make it easier to see if there are common hotspots, themes of concerns – and common concerns raised about individuals.</li> <li>• Ability to respond to requests within the deadline</li> <li>• An extensive reporting facility reduces the amount of time spent creating reports</li> <li>• Consistency - the same procedure will be followed for every case. This will make training easier.</li> </ul> </li> <li>3. The database should:               <ul style="list-style-type: none"> <li>• reduce the risk of human error as all cases will be in a single system</li> <li>• ensure continued compliance with how FOI manages cases.</li> </ul> </li> <li>4. Security – the database will be stand-alone and managed only by the FOI staff. This can strengthen security is important to concern raisers.</li> <li>5. We will be able to automate the feedback collection task when a case is closed.</li> </ol> |
| <b>Are there multiple organisations involved?</b>   | BOB ICB and Digital Interactive Ltd.  |

|   |     |
|---|-----|
| (If yes – you can use this space to name them, and who their key contact for this work is).   |     |
| <b>Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA?</b><br>(If so then include the details here). | No  |
| <b>Detail anything similar that has been undertaken before?</b>   | N/A |

## 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.<br>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 checked="" type="checkbox"/> | Consider if a DPIA is appropriate                              |
| Other  | <input checked="" 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<br><input type="checkbox"/> |
| <b>Why are you relying on consent from the data subject?</b><br><a href="#">Click here to enter text.</a>  |   |
| <b>What is the process for obtaining and recording consent from the Data Subject?</b> (How, where, when, by whom).<br><a href="#">Click here to enter text.</a>  |   |
| <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).<br><a href="#">Click here to enter text.</a>   |   |
| <b>b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY</b>   | Tick or leave blank<br><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><br><a href="#">Click here to enter text.</a>  |   |
| <b>c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT</b>  | Tick or leave blank<br><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).   |   |
| <b>Identify the legislation or legal obligation you believe requires you to undertake this processing.</b>   |   |

|   |   |
|---|---|
| Click here to enter text.   |   |
| <p><b>d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON</b></p> <p>(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).</p> | <p>Tick or leave blank</p> <p><input type="checkbox"/></p>            |
| <p><b>How will you protect the vital interests of the data subject or another natural person by undertaking this activity?</b></p> <p>Click here to enter text.</p>   |   |
| <p><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></p> <p>(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).</p>   | <p>Tick or leave blank</p> <p><input checked="" type="checkbox"/></p> |
| <p><b>What statutory power or duty does the Controller derive their official authority from?</b></p> <p>Freedom of Information Act 2000</p>   |   |
| <p><b>f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY</b></p> <p>(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).</p>  | <p>Tick or leave blank</p> <p><input type="checkbox"/></p>            |
| <p><b>What are the legitimate interests you have?</b></p>   |   |
| <p>Article 9 (2) conditions are as follows:</p>   |   |
| <p><b>a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT</b></p> <p>(Requirements for consent are the same as those detailed above in section 1.2, a))</p>  | <p>Tick or leave blank</p> <p><input type="checkbox"/></p>            |
| <p><b>b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION</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>   | <p>Tick or leave blank</p> <p><input type="checkbox"/></p>            |
| <p><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></p> <p>(Requirements for this are the same as those detailed above in section 1.2, d))</p>   | <p>Tick or leave blank</p> <p><input type="checkbox"/></p>            |
| <p><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></p>  | <p>NA</p>   |
| <p><i>e) The data has been made public by the data subject</i></p>  | <p>NA</p>   |
| <p><i>f) For legal claims or courts operating in their judicial category</i></p>  | <p>NA</p>   |
| <p><b>g) SUBSTANTIAL PUBLIC INTEREST</b></p> <p>(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).</p>  | <p>Tick or leave blank</p> <p><input type="checkbox"/></p>            |
| <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>Tick or leave blank</p> <p><input type="checkbox"/></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).  |   |
| <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> | Tick or leave blank<br><input type="checkbox"/> |
| (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).  |   |
| <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>           | Tick or leave blank<br><input type="checkbox"/> |
| (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            |
|--|-----------------|
| Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board (BOB ICB) | Sole Controller |
| Digital Interactive Ltd. (Infeemation)   | Processor       |
| Click here to enter text.  | Choose an item. |
| Click here to enter text.  | Choose an item. |
| Click here to enter text.  | Choose an item. |
| Click here to enter text.  | Choose an item. |
| Click here to enter text.  | Choose an item. |

**1.5.**

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

Any Data and Information pertinent to the work/projects/meetings/discussions under the BOB ICB, which is appropriate for disclosure as determined under the Freedom of Information Act. The information will be processed by the Infreemation system and used as a management tool for the coordination of FOIs by the BOB ICB FOI Team.

**1.6.**

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

|  |
|--|
| <p><b>If so, specify what types of information.</b> Duty of confidentiality to data subjects, as stipulated under the FOI act, no personal, sensitive, confidential or special category data will be shared</p>  |
| <p><b>1.7.</b><br/> <b>How are you satisfying the common law duty of confidentiality?</b><br/>         No disclosure due to anon/pseudo actions</p> <p><b>If you have selected an option which asks for further information please enter it here</b><br/> <a href="#">Click here to enter text.</a></p>  |
| <p><b>1.8.</b><br/> <b>Are you applying any anonymisation/pseudonymisation technique or encryption to any of the data to preserve the confidentiality of any information?</b><br/>         Yes</p> <p><b>If you are then describe what you are doing.</b><br/>         Review of the data submitted to the system is reviewed for quality control and Data protection. The Infreemation system will automate acknowledgements and responses to the FOI requestor, anonymising where required.</p> <p><u>If you don't know then please find this information out as there are potential privacy implications with the processing.</u></p> |
| <p><b>1.9.</b><br/> <b>Tick here if you are intending to use any information for a purpose that isn't considered as direct patient care.</b> ✓</p> <p><b>If so describe that purpose.</b><br/>         FOI responses to members of the public</p>  |
| <p><b>1.10.</b><br/> <b>Approximately how many people will be the subject of the processing?</b><br/>         Other unknown population number</p>  |
| <p><b>1.11.</b><br/> <b>How are you collecting the data?</b> (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.)<br/>         By e-mail<br/>         Web based data collection<br/>         Choose an item.<br/>         Choose an item.<br/>         Choose an item.</p> <p><b>If you have selected 'other method not listed' describe what that method is.</b><br/> <a href="#">Click here to enter text.</a></p>  |
| <p><b>1.12.</b><br/> <b>How will you edit the data?</b><br/>         BOB ICB staff will be able to respond to and upload information for FOI requests within the Infreemation system, which will be automatically tracked. The BOB ICB FOI Team will be able to edit information uploaded to the system. Access to the system will be restricted to role- based individuals and regularly reviewed.</p>  |
| <p><b>1.13.</b><br/> <b>How will you quality check the data?</b><br/>         The BOB ICB FOI Team will be able to review and edit information uploaded to the system. The system will allow for review and approval by designated FOI responders and approvers.</p>   |
| <p><b>1.14.</b><br/> <b>Review your business continuity or contingency plans to include this activity. Have you identified any risks?</b></p>  |

No

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

**1.15.**

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

Training on the system and its development will be provided by Digital Interactive Ltd. The training will be delivered to the BOB ICB FOI Team as system administrators for BOB ICB. The FOI Team along with Digital Interactive will stagger training to FOI key users/responders/approvers within the BOB ICB as required past the go-live date.

## **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).



Dataflow-Workflow  
Example.pdf

**2.3.**

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

General business Information and data held by the BOB ICB as an NHS public sector organisation, as applicable under the Freedom of Information Act 2000.

**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?**

Only anonymized data will be shared with BOB ICB staff in order to respond to the FOI request.

**2.6.**

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

Members of the public have a right to request access to certain information held by public sector organisations in the UK, including the NHS.

**2.7.**

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

The FOI Requestor/member of the public will receive an email response to their FOI request, generated from the Infreemation System. The email will include any information that has been approved as part of the BOB ICB response to their FOI. The system automatically generates an email notification to the BOB users/staff members. Staff will then log in to the system and can reply/upload/discuss the FOI in a closed/secure conversation area within the system, whilst compiling their FOI response.



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

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

N/A

### 2.8.

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

A DPA between BOB ICB and Digital Interactive Ltd, appended as part of the SLA will be in place prior to the system go-live date of 1<sup>st</sup> December. Meeting to discuss/ sign both on 29<sup>th</sup> November.

### 2.9.

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

The BOB ICB FOI Team will be able to pull off reports from the system which detail the number of FOIs received during any period, the status of FOI's (breached, open, closed), the themes of FOIs being submitted to the BOB ICB.

BOB ICB designated system users/responders will be able to access the system to review the "back catalogue" of FOIs to which the BOB ICB has previously responded to, to allow comparisons and to reduce duplication of information/responses where applicable.

### 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.**

██████████, Director  
Digital Interactive Ltd.  
20-22 Wenlock Road,  
London, England  
N1 7GU

[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 |
|---|------------|--|
| Digital interactive Ltd.                          | Yes        | Z3055308   |
| Buckinghamshire Oxfordshire<br>Berkshire West ICB | Yes        | ZB343068   |



|                           |                 |                           |
|---------------------------|-----------------|---------------------------|
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| 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      |
|--------------------------|---|
| Digital Interactive Ltd. | A completed and scored NHS Standard DTAC form |
| Digital Interactive Ltd. | Service Level Agreement                       |
| Digital Interactive Ltd  | IT Assurance Statement                        |
| Digital Interactive Ltd  | Data Breach Policy                            |
| Digital Interactive Ltd. | Backup Policy                                 |
| Digital Interactive Ltd. | Data Processing Agreement                     |

### 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  |
|--|---------------------------|---------------------------|---|
| Buckinghamshire<br>Oxfordshire Berkshire<br>West ICB | QU9                       | Standards Exceeded        | 27 June 2023  |
| Digital Interactive Ltd.                             | 8K201                     | Standards Met             | 25 August 2022. DI Ltd confirmed DSPT is valid due to submitting early in the year. |
| Click here to enter text.                            | Click here to enter text. | Click here to enter text. | Click here to enter text.   |
| Click here to enter text.                            | Click here to enter text. | Click here to enter text. | Click here to enter text.   |
| Click here to enter text.                            | Click here to enter text. | Click here to enter text. | Click here to enter text.   |
| Click here to enter text.                            | Click here to enter text. | Click here to enter text. | Click here to enter text.   |

### 3.5

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

Cloud based storage. UK based back-ups (hourly or daily, as determined by BOB ICB). Data centre based in London England.

### 3.6

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

Web based access. Role based access controls will be in place.

2 factor authentication required (username and password).

System Admin/ FOI Team will have personal login.

Restricted access to Network files-access permissions will be regularly reviewed.

Responders within the BOB ICB will have access to a single sign on via the website.

### 3.7

**Is there any use of Cloud technology?**

Yes

**If yes add the details here.**

Cloud technology is supported by the supplier, Tier 4 data centre standards. Data centre located in London England.  
The supplier would notify the asset owner of any cloud breaches. If staff have anything to report, they report on the BOB ICB incident reporting system.

### 3.8

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

The ICB has permissions to add/assign users to the system, and to assign those users access/operational privileges (e.g- Standard User settings can only view and respond to cases assigned to them and cannot send/share any information outside of that case or externally.) Access/privileges are role specific. System Administrators and Approvers are set/only within the Governance Team.

#### 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?**

A DSA between BOB ICB and Digital Interactive Ltd. Will be in place prior to the system go-live date.

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

### 4.1

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

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

None required

### 4.2

**How will this activity impact on individual rights under the GDPR?** (Consider the right of access, erasure, portability, restriction, profiling, automated decision making).

No impact

### 4.3

**How long is the data/information to be retained?**

Data will be retained according to ICB Data protection records management policy and schedule.

### 4.4

**How will the data/information be archived?**

In line with the ICB Data protection records management policy and schedule

### 4.5

**What is the process for the destruction of records?**

In line with the ICB Data protection records management policy and schedule

### 4.6

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

On cessation or cancellation of the contract, all data will be returned to BOB ICB

**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.**

| <b>Describe the source of risk and nature of potential impact on individuals.</b><br><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> | <b>Likelihood of harm</b>       | <b>Severity of harm</b>         | <b>Overall risk</b>             |
|--|---------------------------------|---------------------------------|---------------------------------|
| Risk of web-based FOI request form not submitting  | Remote                          | Significant                     | Medium                          |
| Risk of unassigned/incorrect users/staff accessing information they are not permitted to view  | Remote                          | Significant                     | Low                             |
| Risk of accidental deletion of FOI requests/audit trails/evidence  | Remote                          | Minimal                         | Low                             |
| <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> |

**5.2**

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

| <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>  |
|---|---|---------------------------------|---------------------------------|---------------------------------|
| Risk of web-based FOI request form not submitting | This is only likely to materialise if the BOB ICB website were to stop working/become inaccessible.<br>There is a separate email address that is useable and published as a back-up/alternative route for users/public to submit and FOI request. | Reduced                         | Low                             | No                              |
| <a href="#">Click here to enter text.</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="#">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="#">Click here to enter text.</a>   | <a href="#">Choose an item.</a> | <a href="#">Choose an item.</a> | <a href="#">Choose an item.</a> |

**5.3**

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

None identified

**5.4**

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

N/A

**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.**

Digital Interactive Ltd.

**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> |
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| <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>  |
|---|--|---------------------------------|---------------------------------|---------------------------------|
| <a href="#">Click here to enter text.</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> |

|                           |                           |                 |                 |                 |
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| 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: Data Protection Officer

Signature: [Redacted]

Date: 13/12/2023

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.