

## 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 <b>MUST</b> 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 checked="" 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 <b>consider</b> 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 type="checkbox"/>
Processing data on a large scale;	<input type="checkbox"/>
Include data concerning vulnerable data subjects;	<input type="checkbox"/>
Plan to use innovative technological or organisational solutions;	<input type="checkbox"/>

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

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



Background Information	
<b>Date of your DPIA :</b>	26/01/2023
<b>Title of the activity/processing:</b>	Bucks GP Single Domain Migration (PR005011)
<b>Who is the person leading this work?</b>	██████████
<b>Who is the Lead Organisation?</b>	SCWCSU
<b>Who has prepared this DPIA?</b>	██████████
<b>Who is your Data Protection Officer (DPO)?</b>	██████████
<b>Describe what you are proposing to do:</b> (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	Migration of data from Bucks GP surgeries to a centrally managed location within SCW's new data centre.
<b>Are there multiple organisations involved?</b> (If yes – you can use this space to name them, and who their key contact for this work is).	SCWCSU BOB ICB Bucks GP surgeries
<b>Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA?</b> (If so then include the details here).	None
<b>Detail anything similar that has been undertaken before?</b>	Yes for BNSSG, BSW CCG, Surrey Heartlands CCG, Sussex CCG

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

**1.1.**

What data/information will be used? <small>Tick all that apply.</small>	Tick or leave blank	Complete
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 checked="" 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 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 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 UK GDPR includes the following:	
<b>a) THE DATA SUBJECT HAS GIVEN CONSENT</b>	Tick or leave blank <input type="checkbox"/>
<b>Why are you relying on consent from the data subject?</b> <a href="#">Click here to enter text.</a>	

<p><b>What is the process for obtaining and recording consent from the Data Subject?</b> (How, where, when, by whom). Click here to enter text.</p>	
<p><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). Click here to enter text.</p>	
<p><b>b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY</b></p> <p>(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).</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p><b>What contract is being referred to?</b> Click here to enter text.</p>	
<p><b>c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT</b></p> <p>(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).</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p><b>Identify the legislation or legal obligation you believe requires you to undertake this processing.</b> Click here to enter text.</p>	
<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> <input type="checkbox"/>
<p><b>How will you protect the vital interests of the data subject or another natural person by undertaking this activity?</b> Click here to enter text.</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> <input checked="" type="checkbox"/>
<p><b>What statutory power or duty does the Controller derive their official authority from?</b> Click here to enter text.</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> <input type="checkbox"/>
<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> <input type="checkbox"/>
<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> <input type="checkbox"/>

<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>(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 checked="" type="checkbox"/></p>
<p><b>i) PROCESSING IS NECESSARY FOR REASONS OF PUBLIC INTEREST IN THE AREA OF PUBLIC HEALTH, SUCH AS PROTECTING AGAINST SERIOUS CROSS-BORDER THREATS TO HEALTH OR ENSURING HIGH STANDARDS OF QUALITY AND SAFETY OF HEALTH CARE AND OF MEDICINAL PRODUCTS OR MEDICAL DEVICES, ON THE BASIS OF UNION OR MEMBER STATE LAW WHICH PROVIDES FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE RIGHTS AND FREEDOMS OF THE DATA SUBJECT, IN PARTICULAR PROFESSIONAL SECRECY</b></p> <p>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</p>	<p>Tick or leave blank</p> <p><input type="checkbox"/></p>
<p><b>j) PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH <u>ARTICLE 89(1)</u> BASED ON UNION OR MEMBER STATE LAW WHICH SHALL BE PROPORTIONATE TO THE AIM PURSUED, RESPECT THE ESSENCE OF THE RIGHT TO DATA PROTECTION AND PROVIDE FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE FUNDAMENTAL RIGHTS AND THE INTERESTS OF THE DATA SUBJECT.</b></p> <p>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</p>	<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 UK 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 j). 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
BOB ICB	Processor
SCWCSU	Processor
K82070 3W Practice	Sole Controller
K82078 The Allan Practice	Sole Controller



K82004 AMERSHAM HEALTH CENTRE	Sole Controller
K82061 ASHCROFT SURGERY	Sole Controller
Y01964 Berrycroft Community Health Centre	Sole Controller
K82066 Bourne End & Wooburn Green	Sole Controller
K82033 BURNHAM HEALTH CENTRE	Sole Controller
K82044 CARRINGTON HOUSE SURGERY	Sole Controller
K82029 CHERRYMEAD SURGERY	Sole Controller
K82020 CHILTERN HOUSE MED CENTRE	Sole Controller
K82603 CRESSEX HEALTH CENTRE	Sole Controller
K82021 CROSS KEYS PRACTICE	Sole Controller
K82055 DENHAM MEDICAL CENTRE	Sole Controller
K82017 DESBOROUGH SURGERY	Sole Controller
K82079 EDLESBOROUGH SURGERY	Sole Controller
K82058 GLADSTONE ROAD SURGERY	Sole Controller
K82028 HADDENHAM MEDICAL CENTRE	Sole Controller
K82008 HALL PRACTICE	Sole Controller
K82012 HIGHFIELD SURGERY	Sole Controller
K82049 HUGHENDEN VALLEY SURGERY	Sole Controller
K82006 IVERS MEDICAL CENTRE	Sole Controller
K82035 JOHN HAMPDEN SURGERY	Sole Controller
K82022 KINGSWOOD SURGERY	Sole Controller
K82621 LITTLE CHALFONT SURGERY	Sole Controller
K82019 MANDEVILLE PRACTICE	Sole Controller
K82023 MARLOW MEDICAL GROUP	Sole Controller
K82011 Millbarn Medical Centre	Sole Controller
K82051 MISBOURNE SURGERY	Sole Controller
K82024 New Surgery	Sole Controller
K82014 OAKFIELD SURGERY	Sole Controller
K82038 POPLAR GROVE PRACTICE	Sole Controller
K82053 PRIORY SURGERY	Sole Controller
K82618 PROSPECT HOUSE SURGERY	Sole Controller
K82001 RECTORY MEADOW SURGERY	Sole Controller
K82036 RIVERSIDE SURGERY	Sole Controller
K82046 Simpson Centre	Sole Controller

K82045 SOUTHMEAD SURGERY	Sole Controller
K82048 STOKENCHURCH MEDICAL CENTRE	Sole Controller
K82007 SWAN PRACTICE	Sole Controller
K82031 THREEWAYS SURGERY	Sole Controller
K82010 TOWER HOUSE SURGERY	Sole Controller
K82047 Unity	Sole Controller
K82068 WADDESDON SURGERY	Sole Controller
K82037 WATER MEADOW SURGERY	Sole Controller
K82073 Westongrove	Sole Controller
K82040 WHITEHILL SURGERY	Sole Controller
K82030 Wye Valley Surgery	Sole Controller

**1.5.**

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

All data currently held on the local server at all GP main sites is being moved to a single central location within the SCW's new data centre as part of the Bucks Single Domain Migration project.

**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)

Health and Safeguarding data

**1.7.**

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

Reasonable expectations (please specify)

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

This is simply an electronic data transfer which is not viewed by any people.

**1.8.**

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

No

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

The data is being transferred in an encrypted tunnel across the Health and Social Care Network.

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.**

Data is being moved to a new data centre

**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.)

No data collection involved

Choose an item.

Choose an item.

Choose an item.

Choose an item.

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

[Click here to enter text.](#)

**1.12.**

**How will you edit the data?**

N/A – the data will not be edited

**1.13.**

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

GP surgery will check that the data has been correctly moved and that they have access to the data they need with the correct security level immediately following the migration of data at that site.

The old server containing the data transferred to the SCW data centre will remain on site and can be reinstated should there be any transfer issues. There will also be a virtual server back-up of the old server which can be made available.

**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?**

None planned

## 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).

Data is being transferred to the SCW data centre over the sites Health and Social Care Network connection (100Mbps). Each practice will be migrated individually with the first data cut taken over the weekend prior to the practice migration commencing the following Tuesday.

**2.3.**

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

The information will not be shared to anyone

**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?**

N/A

**2.6.**

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

N/A

**2.7.**

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

N/A

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

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

[Click here to enter text.](#)

**2.8.**

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

N/A

**2.9.**

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

N/A

**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.**

Equipment disposals – Blackmore UK. Chitterne Dairy, Shrewton Road, Warminster, BA12 0LJ

[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
SCWCSU	Yes	Z2950066
BOB ICB	Yes	ZB343068
	Yes	
	Yes	

**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
SCWCSU	DSP Toolkit and Cyber Essentials +
BOB ICB	DSP Toolkit
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

**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
SCWCSU	ODF	22/23 Standards exceeded	22/06/22
BOB ICB	QU9	22/23 Standards exceeded	27/06/22
Bucks GP Practices	Various	Various 2022/23 Standards Met	<a href="#">Click here to enter text.</a>

**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).  
[Click here to enter text.](#)

**3.6**  
**How is the data/information accessed and how will this be controlled?**  
The data being migrated to the new data centre will be stored in the same folder structure as previously agreed with the GP Practices. The Practice Manager will verify that the correct practice users have access. Access is governed by User Group security (built in to Microsoft Windows NTFS) i.e. via an individual's Windows log in to their PC  
A small group of SCW third line support engineers will also have administrator access to the practice data. This is required in order to make changes to the file and folder permissions as requested by the practices.  
In the case of the server hardware move, the servers will remain on site for a minimum of 3 months (powered down), before being collected for secure disposal in accordance with current legislation.

**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?

New data centre security measures. NTFS file permissions in line with current SCW security policies. Annually a third party company conduct a 'penetration' test to ensure security measures are maintained.  
Please also refer to 5011 - Security Details for CSU Data Centre.docx



5011 - Security  
Details for CSU Data (

#### 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?**

Data is being moved under contract and a statement of work The SCW Digital Programme Manager will be responsible for the contract and Statement of Work.

## 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 UK GDPR?** (Consider the right of access, erasure, portability, restriction, profiling, automated decision making).

N/A

### 4.3

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

Data to be retained in line with NHS Records Management Code of Practice 2021 retention schedule

### 4.4

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

Data will not be archived

### 4.5

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

As described in the organisations retention policy

### 4.6

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

The servers will be removed by a fully compliant & accredited IT disposal company who will shred the old server hard drives. The data remains the responsibility of the data controller.

### 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
Loss/corruption of data during transfer to the new data centre	Remote	Significant	Medium
Loss of old Server	Remote	Significant	Medium
Loss of access to data during the transfer to the new data centre	Possible	Significant	High
Data is accessed by unauthorised individual on local practice server after it has been removed from the practice	Possible	Significant	High

### 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)
Loss/corruption of data during transfer to the new data centre as identified by the practice	The data will be included in a backup prior to transfer and will also remain on the server for re-transferring if required. There is also a complete virtual backup of the server.	Reduced	Low	Choose an item.
Loss of Server	The old servers will be removed by a fully compliant & accredited IT disposal company using a direct route from site to storage facility. We will also request that hard drives are shredded on site if possible.	Reduced	Low	Choose an item.
Practices unable to access data during the transfer to the new data centre	Practices will be fully informed regarding timescales for loss of access. This will allow them to prepare offline copies of files that are still required.	Reduced	Low	Choose an item.

Data is accessed by unauthorised individual on local practice server after it has been removed from the practice	Local practice server to be securely transported to secure storage for disposal. IT disposal company to provide certificate of destruction	Reduced	Low	Choose an item.
<b>5.3</b> <b>What if anything would affect this piece of work?</b> N/A				
<b>5.4</b> <b>Please include any additional comments that do not fit elsewhere in the DPIA?</b> None				
<b>6. Consultation</b>				
<b>6.1</b> <b>Have you consulted with any external organisation about this DPIA?</b> No  <b>If yes, who and what was the outcome? If no, detail why consultation was not felt necessary.</b> Transfer of data already considered and encapsulated within agreed Statement of Work				
<b>6.2</b> <b>Will you need to discuss the DPIA or the processing with the Information Commissioners Office?</b> (You may need the help of your DPO with this) No  <b>If yes, explain why you have come to this conclusion.</b> <a href="#">Click here to enter text.</a>				
<b>7. Data Protection Officer Comments and Observations</b>				
<b>7.1</b> <b>Comments/observations/specific issues</b>	Practice to update their privacy notice. Example text is provided below. Practices that use the SCW privacy notice templates should add this to the list of data processors in Appendix A.			
	Practice local data	<p><b>Purpose</b> – Practice data including referral templates, staff payroll information, user guides, GMS contract information, staff appraisals, equipment asset lists, practice policies e.g. business continuity plans is stored on single central location within the SCW’s data centre as part of the Bucks Single Domain Migration project.</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p><b>Processor</b> – SCW</p>		

## 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
<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	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)
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.

Signed and approved on behalf of [Click here to enter text.](#)

Name: [REDACTED]

Job Title: Data Protection Officer

Signature: [REDACTED]

Date: 24/06/2024

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.](#)