

## Ref- 24-25 -001

# 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 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>	08/08/2024
<b>Title of the activity/processing:</b>	IFR and PA Data Transfer to BOB ICB from the SCW CSU CPI Service.
<b>Who is the person leading this work?</b>	██████████
<b>Who is the Lead Organisation?</b>	Buckinghamshire, Oxfordshire and Berkshire West ICB
<b>Who has prepared this DPIA?</b>	██████████
<b>Who is your Data Protection Officer (DPO)?</b>	██████████
<b>Describe what you are proposing to do:</b> (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	Buckinghamshire, Oxfordshire and Berkshire West (BOB) Integrated Care Board (ICB) Clinical Effectiveness (CE) team currently run a case management system (Blueteq) for Prior Approval (PA) and Individual Funding Requests (IFR) for Oxfordshire place. Blueteq was implemented by BOB ICB's predecessor organisation, Oxfordshire Clinical Commissioning Group (OCCG) as the case management system for Oxfordshire patients in 2016. PA and IFR function for Buckinghamshire and Berkshire West patients has been under contract to South Central and West Commissioning Support Unit (SCW CSU) by the two relevant CCGs. With the forming of three CCGs into BOB ICB a business case was developed and approved by NHS England to in-house the SCW CSU function to align processes, improve the quality of service, eliminate inequalities, and provide cost savings. The proposal is not to develop a new system, this DPIA relates to the transfer of BOB ICB Buckinghamshire and Berkshire West patient case records from SCW CSU's Blueteq case management system to BOB ICB's already existing Blueteq case management system.
<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).	SCW CSU Clinical Policy Implementation (CPI) team – ██████████ Blueteq – ██████████ BOB ICB CE team – ██████████
<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).	No
<b>Detail anything similar that has been undertaken before?</b>	N/A

1. Categories, Legal Basis, Responsibility, Processing, Confidentiality, Purpose, Collection and Use		
<b>1.1.</b>		
<b>What data/information will be used?</b> Tick all that apply.	Tick or leave blank	<b>Complete</b>
Personal Data	✓	1.2
Special Categories of Personal Data	✓	1.2 AND 1.3
Personal Confidential Data	✓	1.2 AND 1.3 AND 1.6

Sensitive Data (usually criminal or law enforcement data )	<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 type="checkbox"/>	Consider at what point the data is to be anonymised
Commercially Confidential Information	<input type="checkbox"/>	Consider if a DPIA is appropriate
Other	<input type="checkbox"/>	Consider if a DPIA is appropriate

**1.2.**

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

Article 6 (1) of the GDPR includes the following:	
<b>a) THE DATA SUBJECT HAS GIVEN CONSENT</b>	Tick or leave blank <input 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).	
Describe how your consent form is compliant with the Data Protection requirements? (There is a checklist that can be used to assess this).	
<b>b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY</b>	Tick or leave blank <input type="checkbox"/>
(The contract needs to be between the Controller and the individual and not concern data being processed due to someone else having a contract with the Controller. Processing can happen before the contract is entered into e.g. processing a pre-health assessment for a private or cosmetic procedure that is a paid for service with the delivery of that care done under contract between the Patient and the Practitioner).	
What contract is being referred to? <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 <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. <a href="#">Click here to enter text.</a>	
<b>d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON</b>	Tick or leave blank <input type="checkbox"/>
(This will apply only when you need to process data to protect someone's life. It must be necessary and does not only relate to the individual whose data is being processed. It can also apply to protect another person's life. Emergency Care is likely to fall into this category but planned care would not. You may need to process a Parent's data to protect the life of a child. The individual concerned is unlikely to be able to provide consent physically or legally; if you are able to gain consent then this legal basis will not apply).	
How will you protect the vital interests of the data subject or another natural person by undertaking this activity? <a href="#">Click here to enter text.</a>	
<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>	Tick or leave blank <input checked="" type="checkbox"/>
(This is different to 6 c). If you are processing data using this basis for its lawfulness then you should be able to identify a specific task, function or power that is set out in law. The processing must be necessary, if not then this basis does not apply).	
What statutory power or duty does the Controller derive their official authority from? Health & Social Care Act (Safety and Quality) Act 2015 – Direct Care Provision	

<p>The legal basis for commissioning purposes:          Power to commission certain health services – Power – Section 3A NHS Act 2006:          Each ICB has the power to arrange for the provision of such services or facilities as it considers appropriate for the purposes of the health service that relate to securing improvement in –          (a) the physical and mental health of persons for whom it has responsibility; or          (b) the prevention, diagnosis and treatment of illness in those persons.</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>(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</u></b></p>	<p>Tick or leave blank</p>

**89(1) BASED ON UNION OR MEMBER STATE LAW WHICH SHALL BE PROPORTIONATE TO THE AIM PURSUED, RESPECT THE ESSENCE OF THE RIGHT TO DATA PROTECTION AND PROVIDE FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE FUNDAMENTAL RIGHTS AND THE INTERESTS OF THE DATA SUBJECT.**



(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 & West Berkshire (BOB) Integrated Care Board (ICB)	Sole Controller
Blueteq Limited	Processor
SCW CSU	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.

**1.5.**

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

We are moving BOB ICB Buckinghamshire and Berkshire West patient PA and IFR cases from SCW CSU CPI team to BOB ICB CE team Blueteq case management system. We are transferring the data as part of in-housing the PA and IFR function from SCW CSU as approved via a business case by NHS England. The processing will be done by Blueteq over a weekend so as not to interrupt normal BOB ICB PA and IFR business function.

Some of the data transferred will be confidential including:

NHS Number

Date of Birth

Initials or name

Patient's GP Practice

Intervention requested

Clinical information required for specific treatments. The data collected is to confirm appropriateness for funding

**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)

Patient case records specific to PA or IFR funding which can include NHS Number, Date of Birth, Initials or name, Patient's GP Practice, Intervention requested, clinical information required for specific treatments.

**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**

[Click here to enter text.](#)

**1.8.**

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

No

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

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.**

[Click here to enter text.](#)

**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.

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

**1.12.**

**How will you edit the data?**

The data will not be edited, the data is being transferred from SCW CSU to BOB ICB

**1.13.**

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

The data will not be quality checked; the data will be transferred as it is from one system/organisation to the other

**1.14.**

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

No

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

**1.15.**

**What training is planned to support this activity? No**

## 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.**

### 2.2.

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

Blueteq will extract the data from SCW CSU's case management system and transfer it in BOB ICB's case management system

### 2.3.

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

The data will not be shared, the data is being transferred from SCW CSU's case management system into BOB ICB's case management system

### 2.4.

**Is any of the data subject to the National Data Opt Out?**

No - it is not subject to the national data opt out

**If your organisation has to apply it describe the agreed approach to this**

[Click here to enter text.](#)

**If another organisation has applied it add their details and identify what data it has been applied to**

[Click here to enter text.](#)

If you do not know if it applies to any of the data involved then you need to speak to your Data Protection Officer to ensure this is assessed.

### 2.5.

**Who are you planning to share the data/information with?**

The data will not be shared, the data is being transferred from SCW CSU's case management system into BOB ICB's case management system

### 2.6.

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

The data will not be shared, the data is being transferred from SCW CSU's case management system into BOB ICB's case management system

### 2.7.

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

The data will not be shared, the data is being transferred from SCW CSU's case management system into BOB ICB's case management system

**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**

### 2.8.

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

Not required

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

No reports will be generated as part of the data transfer.

**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.**

Blueteq Limited, Unit A5, Endeavour Business Park, Penner Road, Havant, PO9 1QN

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
Blueteq Limited	Yes	Z2946230
BOB ICB	Yes	ZB343068
SCW CSU	Yes	Z29500066
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
Blueteq Limited	DSPT



BOB ICB	DSPT, Cyber Essentials +
SCW CSU	DSPT
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.

### 3.4

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

##### DSP Toolkit

Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	ODS Code	Status	Published date
Blueteq Limited	8HR52	23/24 Standards Exceeded	28/03/2024
BOB ICB	QU9	23/24 Standards Exceeded	27/06/2024
SCW CSU	ODF	23/24 Standards Exceeded	25/06/2024
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).

The data is stored on servers owned and managed by Blueteq Limited within a Tier 4 data centre in Hampshire, England. The data is not transferring outside of the Tier 4 data centre it is being transferred from SCW CSU case management system to BOB ICB case management system.

### 3.6

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

The data will not be accessed, the data is being transferred from SCW CSU's case management system into BOB ICB's case management system

### 3.7

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

No

#### If yes add the details here.

As outlined above, the service is accessed via the web however there is no use of "cloud" storage as the application and database servers are owned, managed and monitored by Blueteq.

### 3.8

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

There are extensive physical security measures at the data centre to protect the servers and data, including biometric access, as well as redundancy in power supply and internet access.

Firewalls and anti-virus software are part of the system's security defences. These are updated in line with new patches/releases as advised by Blueteq's suppliers as outlined in "Blueteq Disaster Handling and Business Continuity Plan 2024"

Blueteq monitors and applies updates to our systems to mitigate threats. Blueteq receive patches and updates from its suppliers which are tested and then applied.

The firewall configuration implemented within the system is well placed to handle "denial of service" attacks and if a threat is detected then the firewall will block that attacker. Blueteq also has a backup firewall as a

further level of security and threat mitigation. As outlined in the attached document Blueteq has implemented a server environment that ensures load balancing and resilience in the unlikely event of a hardware failure.

**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?**

The existing licence agreement with the GDPR covers the issues of Blueteq acting as the Data Processor.

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

**4.1**

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

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

No changes required.

**4.2**

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

There is no impact on individual rights.

**4.3**

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

Data will be retained in line with the ICB record retention policy for this service.

**4.4**

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

Data will be archived in line with BOB ICB records management policy.

**4.5**

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

Data will be destroyed in line with BOB ICB records management policy

**4.6**

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

The data will be returned to the ICB as outlined in the "Termination of the Licence Agreement" section of the Licence Agreement. A full back up of the database is returned to the ICB to ensure a complete record of all data is provided. Once the client has confirmed receipt of the data, it will be permanently removed from the servers and a certificate of destruction issued.

**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> <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>
Inappropriate Access to data (ICB)	Remote	Minimal	Low
Inappropriate Access to data	Remote	Minimal	Low
Data Quality/Inaccurate data	Possible	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**

<b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in 5.1</b>				
<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>
Inappropriate Access to data (ICB)	<p>Within the ICB only identified authorised users will have access to the system. User access (login detail) is controlled and provided via Authorised Super Users at the ICB</p> <p>Functions are available to amend user access based on their role and in accordance with the ICB's IG Policy.</p> <p>Additionally Blueteq has implemented Multi Factor Authentication (MFA) for each login further reducing the opportunity for inappropriate access.</p> <p>Functions exist to also restrict visibility of Patient Identifiable data to users based on their role, e.g. NHS number, initials, date of Birth</p>	Eliminated	Low	Choose an item.
Inappropriate Access to data	Only authorised users will have access to the system and the data available will be based upon their role in accordance with the IG Policy.	Reduced	Low	Choose an item.

	Additionally Blueteq has implemented Multi Factor Authentication (MFA) for each login further reducing the opportunity for inappropriate access.			
Data Quality / Inaccurate data	<p>Patient data is entered by NHS staff/clinicians and checked at each contact. Additionally, functions exist within the system to verify entry of key data including NHS number and GP Practices.</p> <p>User is prompted to confirm data when submitting subsequent requests/notifications.</p> <p>Users have the ability to update the patient record to reflect changes where required.</p> <p>Blueteq does have a standard API/Interface to facilitate integration between hospital management systems, e.g. Patient Administration Systems, Prescribing Systems, etc.,</p>	Reduced	Low	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

### 5.3

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

N/A

### 5.4

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

N/A

## 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.**

### 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

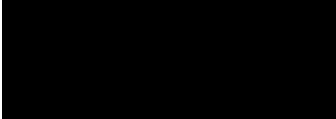
Residual risks and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	Likelihood of harm	Severity of harm	Overall 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 Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board

Name: XXXXXXXXXX

Job Title: Data Protection Officer

Signature:  Date: 28/08/2024

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.](#)