DPIA For Research

Before completing this form, please ensure you have completed the DPIA screening questionnaire and reviewed the DPIA guidance in the Information Governance Handbook.

This DPIA should be completed by those responsible for the project.

You should start to fill out the template at the start of any project involving the use of personal data (following completion of the DPIA screening questionnaire where it has indicated the need), or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

PLEASE NOTE: The Blue text are links to definitions/explanations of what is being asked on this form; please refer to link information when completing this DPIA.

Title of Project:	
Details of the person completing this DPIA	
Main researcher name:	
Job title:	
Employing organisation and department:	
Email:	
Telephone number:	
Contact details for main researcher's line manager at Coventry City Council:	
Academic institution's details: Please include name of institution, course, academic supervisor and email.	

Contact details for other researchers/departments/organisations who will work on the project: Please include name, role and organisation name.	
Sponsor details: Please include name of organisation, name of sponsor and contact email.	

Section 1. Identify the need for a DPIA

1	Describe the purpose and aims of the research.	
2	Explain the type of processing involved. Include details of the method of data collection and source of personal data, and how data will be processed after collection.	
3	Will the project involve the processing of information about individuals for a purpose which is not currently used?	
4	What is the project start date? If the project has already started, please state the date.	
5	Summarise why you identified the need for a DPIA, using the DPIA screening checklist as guidance.	

6	Who approved the project? (For example, the name of the committee or group, or it could be an email from a senior manager approving the project) What data was approved?	
	Are there any external organisations involved in this project? E.g Other local authorities, NHS Trusts. Please provide details of all external organisations, including names, job titles and contact details.	
7	What are the aims and/or benefits of this project? Please include an explanation of how the processing of personal data will help achieve those aims.	
8	Is there a system(s) involved in this project / work? If yes, please provide the name of the system(s)	

9	Who is/are the data controller(s) for this project? If applicable, please attach a copy of the Data Sharing Agreement.	
10	Who is/are the data processor(s) for this project? If applicable, please attach a copy of the Data Processing Agreement.	
11	Who are the data subjects and do you have a relationship with the data subjects? NB: Data subjects include research participants, patients, staff, service users (children and vulnerable adults), website users.	
12	Can this project be carried out without using person identifiable information? (For example, by using anonymised or pseudonymised information)	

13	Will data be anonymised? If so, please state at what point anonymisation will take place in the project.	
14	**ONLY need to answer if the processing involves clinical/health data.** What impact does this project / work have on the EPR (Electronic Patient Record? **(Please ensure you have consulted with the EPR team before providing a response)**	

Section 2. Personal Data

15	Select all fields of personal data that will be processed and provide justification.		
	Personal data		**Justification**
	Name		
	Address		
	Postcode		
	Telephone number		
	Email address		
	Date of birth		
	Gender		
	GP details		
	Other		
	Special category data		
	Race		
	Ethnic Origin		
	Religion		
	Biometric data		
	Learning disabilities		
	Genetic data		
	Health data		
	Sexual life/orientation		
	Other		

16	If you are processing special category data (as listed above), please state how this data processing is linked to your research objectives.	
17	How will the personal data be collected and by whom? E.g. Online, paper forms – completed by data subjects or feeds from other systems. If so, please list the system(s)	
18	How will the personal data be used? Ensure all purposes are listed as the personal data can only be used for the specified purposes, which must be a lawful use of the data.)	
19	How will the personal data be stored? State the format of the data and describe how it will be stored, e.g. filing cabinets, on premise servers or storage devices, cloud hosted services.	

20	How long will identifiable/pseudonymised data be stored? This is the retention period for the personal data. If Coventry City Council employee, please refer to the retention schedule. If not, please refer to your organisation's retention schedule.	
21	Where will data be stored during and after the research project has been completed? E.g. Coventry City Council's system or an external system.	
22	What country will the personal data be stored in? Please state whether or not personal data will be transferred outside of UK. If data will be transferred outside of UK, please add it as a risk in Section 7. All data transfers outside the UK carry some risk and it is important to ensure technical measures are in place to protect the data.	
23	Please include details, setting out how data will be deleted.	

<table>
<tr><td>24</td><td>Will personal data be shared with anyone outside Coventry City Council? (If yes, describe who it will be shared with, the frequency of the processing, the duration and how)</td><td></td></tr>
<tr><td>25</td><td>Provide a description of the data flows (this refers to the collection, retention, use, transfer and deletion of data as part of the project – i.e. all types of data processing as part of the project's lifecycle of personal data).

You may find it helpful to attach a data flow map, showing how data will be transferred inside and outside of Coventry City Council, clearly showing who will have access to the data.</td><td></td></tr>
<tr><td>26</td><td>How many individuals are likely to be affected by the project?</td><td>
<table>
<tr><td>Up to 100</td><td></td><td>Up to 500,000</td><td></td></tr>
<tr><td>Up to 1000</td><td></td><td>Up to 1 Million</td><td></td></tr>
<tr><td>Up to 10,000</td><td></td><td>1 Million +</td><td></td></tr>
<tr><td>Up to 100,000</td><td></td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td>27</td><td>What geographical area does this cover?</td><td></td></tr>
<tr><td>28</td><td>Does the project involve pulling together information about individuals from different places, linking it or cross referencing?</td><td></td></tr>
</table>

Section 3. Lawful basis for processing

29	What is your lawful basis for processing? – Please select the appropriate lawful basis for processing data from the list of Article 6 UK GDPR lawful bases below. (What conditions for processing will be relied upon to process the personal data)	
Article 6(1)(a)	Consent: the individual has given clear consent for you to process their personal data for a specific purpose	
Article 6(1)(b)	Contract: the processing is necessary for a contract with the individual, or because they have asked you to take specific steps prior to the contract.	
Article 6(1)(c)	Legal obligation: the processing is necessary to comply with a legal obligation by the data controller.	
Article 6(1)(d)	Vital interests: the processing is necessary to protect the vital interests of a data subject (such as someone's life).	
Article 6(1)(e)	Public task: the processing is necessary for the performance of a task in the public interest or for official functions.	
Article 6(1)(f)	Legitimate interests: the processing is necessary for the legitimate interests of the data controller or a third party. For information, please refer to the ICO's guidance on carrying out Legitimate Interests assessments. If you require additional support, please contact Information Governance.	
30	**Special category data (racial, ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life and orientation). Please refer to the ICO's guidance for additional information.** 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. Please select the appropriate lawful bases from the list of Article 9 UK GDPR lawful bases below.	
Article 9(2)(a)	Explicit consent of the data subject (the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject)	

Article 9(2)(b)	Employment and social security and social protection (processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law)	
Article 9(2)(c)	Vital interests (processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent)	
Article 9(2)(d)	Not-for-profit bodies (processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body)	
Article 9(2)(e)	Made public by the data subject (processing relates to personal data which are manifestly made public by the data subject)	
Article 9(2)(f)	Legal claims or judicial acts (processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity)	
Article 9(2)(g)	Reasons of substantial public interest (processing is necessary for reasons of substantial public interest, 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)	
Article 9(2)(h)	Health or social care (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 and social care systems and service)	

Article 9(2)(i)	Public health (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)		
Article 9(2)(j)	Archiving, research and statistics (with a basis in law) (processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes 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 interest of the data subjects)		
31	**If conditions (b), (h), (i) or (j) are being relied upon for Q31, the associated condition in Part 1 of Schedule 1 of the Data Protection Act 2018 needs to be met.**	**Not Applicable**	
		MET	
		Not Met	
		Plan in place to meet the requirements	

32	**How will the rights of individuals be managed in relation to this project?(ü)**		
Article 12	The right to be informed Please attach a copy of the Participant Information Sheet and Privacy Notice.		
Article 15	The right of access		
Article 16	The right to rectification		
Article 17	The right to erasure		
Article 18	The right to restrict processing		
Article 20	The right to data portability		

Article 21	The right to object		
Article 22	The right to ask for human intervention in automated decision making		

Section 4. Details about the Information Asset (system)

This section is to be completed if the answer to Question 12 was 'Yes' - there is a system being used for the project/processing.

15

33	What is the Name of the system?	
	What is the system going to be used for?	
34	Has this system (information asset) been added to the Information Asset Register? NB: All council employees will need to add the system to the Information Asset Register. Please contact Information Governance for guidance.	
35	Who is the Information Asset Owner?	Name:
		Job title:
		Department:
		Email:
		Telephone:
36	Who will have access to this system (information asset), and how will the access be controlled?	
37	Is there a contract in place with the system provider? **(There will need to be a contract in place with the supplier of the system. If there is not a contract in place, explain why not?)**	

	Who are the named individuals or organisations that are party to the contract?	
38	Is a Data Processing Agreement required? **Please seek advice from the IG team, who can advise, provided Sections 1, 2 and 3 of this DPIA have been completed. If a Data Processing Agreement is already in place, please attach a copy.**	
39	Is a Data Sharing Agreement / Information Sharing Agreement required? **Please seek advice from the IG team, who can advise, provided Sections 1, 2 and 3 of this DPIA have been completed. If a Data Sharing Agreement is already in place, please attach a copy.**	
40	Do you have a process in place to support the system being kept up to date and the continued accuracy of the information contained within it?	
41	Is there a documented business continuity plan in place for this system? **(this is required so if there isn't one then add this as a risk in Section 7)**	

Section 5. Consultation process

42	**List the Stakeholders for this project.**	
43	Have you consulted with all stakeholders? **If you have not, justify why it's not appropriate to do so.** **Explain how you have assessed what participants will think of the research and what you have done to address any concerns raised, if any.** **Examples – participant information sheet/consent form/focus group.**	
44	What was the outcome of your consultations, and how will they be incorporated back into the project?	

Section 6. Identify and assess risks

45	Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.			
Risks		**Likelihood of harm** (Remote, Reasonable possibility or More Likely than Not)	**Severity of harm** (Minimal Impact, Some Impact or Serious Harm)	**Overall risk** (Low Risk, Medium Risk, or High Risk)
1 *Example*	*Data subject not expecting data to be used in this way.*	*Reasonable*	*Minimal*	*Low*
2	*Incomplete anonymisation*	*Reasonable*	*Some impact*	*Medium*
3				
4				

Section 7. Identify measures to reduce risk

46	Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in section 6.			
Risk	**Options to reduce or eliminate risk**	**Effect on risk** Eliminated, Reduced, Or Accepted	**Residual risk** Low medium high	**Measure approved by the relevant IAO** Yes/No
1	*Provide data subjects with a participant information sheet and privacy notice.*	*Eliminated*	*Low*	
2	*Ensure all those that have access to the research data are appropriately trained on anonymising data and technical measures are in place to ensure the security of personal data.*	*Eliminated*	*Low*	
3				

Section 8. Sign off and record outcomes				
47	Measures approved by: (IAO). **Integrate actions back into project plan, with date and responsibility for completion**	**Name:**		
		Position:		
		Date:		
48	Residual risks approved by (IAO) **If accepting any residual high risk, consult the ICO before going ahead, VIA THE DPO TEAM**	**YES**	**NO**	
		Date:		
49	Has DPO advice Been provided:			
50	Summary of DPO advice:			
51	DPO advice accepted or overruled by: (IAO) **If overruled, you must explain your reasons**			
52	Comments:			
53	Consultation responses reviewed by: **If your decision departs from individuals' views, you must explain your reasons**			