**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.

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| You as Controller **MUST** carry out a DPIA where you plan to: | Tick or leave blank |
| Use **profiling or automated decision-making** to make significant decisions about people or their access to a service, opportunity or benefit; | [ ]  |
| Process **special-category data or criminal-offence data on a large scale**; | [ ]  |
| **Monitor a publicly accessible place** on a large scale; | [ ]  |
| Use **innovative technology** in combination with any of the criteria in the European guidelines; | [ ]  |
| Carry out **profiling** on a large scale; | [ ]  |
| **Process biometric or genetic data** in combination with any of the criteria in the European guidelines; | [ ]  |
| **Combine, compare or match data** from multiple sources;  | [ ]  |
| Process personal data **without providing a privacy notice** directly to the individual in combination with any of the criteria in the European guidelines; | [ ]  |
| Process personal data in a way that involves **tracking** individuals’ online or offline location or behaviour, in combination with any of the criteria in the European guidelines; | [ ]  |
| Process **children’s** personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them; | [ ]  |
| Process personal data that could result in a **risk of physical harm** in the event of a security breach. | [ ]  |

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| 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; | [ ]  |
| Plan to do evaluation or scoring; | [ ]  |
| Want to use systematic monitoring; | [ ]  |
| Process sensitive data or data of a highly personal nature; | [ ]  |
| Processing data on a large scale; | [ ]  |
| Include data concerning vulnerable data subjects; | [ ]  |
| Plan to use innovative technological or organisational solutions; | [x]  |

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.

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| Background Information  |
| **Date of your DPIA :** | 01/06/2020 |
| **Title of the activity/processing:**  |  Identification of SusPECted seveRe Asthma in Adults (SPECTRA) |
| **Who is the person leading this work?** | James Rose |
| **Who is the Lead Organisation?** | Oxford Academic Health Science Network (AHSN) |
| **Who has prepared this DPIA?**  | IG Consultant for South Central and West CSU |
| **Who is your Data Protection Officer (DPO)?**  | DPO for AHSN -DPO for Primary Care -  |
| **Describe what you are proposing to do:**(Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required). | SPECTRA primary care clinical system resources have been developed to help the GPs to identify adults with potential severe asthma, optimise treatment and, where required, refer them to severe asthma centres. SPECTRA GP clinical system resources (searches, alerts and coded form to support the referral process) are hosted on https://suspected-severe-asthma.co.uk/GP practices can register and download these resources and import them into their existing clinical systems. PCNs, CCG, Severe Asthma Centres and AHSNs can also register on SPECTRA to access overview reporting relating to the number of patients identified for review, those that have been reviewed and those referred to severe asthma centres.In order for the dashboards to be populated practices need to upload their search results (this contains NO PERSONAL OR PATIENT IDENTIFIABLE INFORMATION). |
| **Are there multiple organisations involved?** (If yes – you can use this space to name them, and who their key contact for this work is)**.** | SPECTRA is a Medical and Educational Goods and Service, organised and funded by AstraZeneca and delivered by Oberoi Consulting. By registering the practice agrees to sharing of **numerical aggregated data** (**NO PERSONAL OR PATIENT INFORMATION)** with their PCN/Cluster, CCG/HSCP/UHB/AHSN and AstraZeneca. Patient numbers between 1 and 7 are suppressed, aligned to NHS Digital's approach to suppression of small patient counts. None of the parties will be able to identify any patients from this data.  |
| **Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA?**(If so then include the details here). | Relevant CCG where they are the commissioners of the service on behalf of their Practices.GP DPO |
| **Detail anything similar that has been undertaken before?**  | Not known |

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

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| **What data/information will be used?** Tick all that apply. | Tick or leave blank | **Complete** |
| 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 ) | [ ]  | 1.2 but speak to your IG advisor first |
| Pseudonymised Data | [ ]  | 1.2 and consider at what point the data is to be pseudonymised |
| Anonymised Data | [ ]  | Consider at what point the data is to be anonymised |
| Commercially Confidential Information | [ ]  | Consider if a DPIA is appropriate |
| Other The search results used populate the dashboards reports contains NO PERSONAL OR PATIENT INFORMATION. Only counts/numbers of patients (contains no record level data) identified by each search.  | [x]  | Consider if a DPIA is appropriate |

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| **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.**

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| Article 6 (1) of the GDPR includes the following: |
| 1. **THE DATA SUBJECT HAS GIVEN CONSENT**
 | **Tick or leave blank** |
| [ ]  |
| **Why are you relying on consent from the data subject?**Click here to enter text. |
| **What is the process for obtaining and recording consent from the Data Subject?** (How, where, when, by whom).Click here to enter text. |
| **Describe how your consent form is compliant with the Data Protection requirements?** (There is a checklist that can be used to assess this). Click here to enter text. |
| 1. **IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY**

(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). | **Tick or leave blank** |
| [ ]  |
| **What contract is being referred to?** Click here to enter text. |
| 1. **IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT**

(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). | **Tick or leave blank** |
| [ ]  |
| **Identify the legislation or legal obligation you believe requires you to undertake this processing.** Click here to enter text. |
| 1. **IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON**

(This will apply only when you need to process data to protect someone’s life. It must be necessary and does not only relate to the individual whose data is being processed. It can also apply to protect another person’s life. Emergency Care is likely to fall into this category but planned care would not. You may need to process a Parent’s data to protect the life of a child. The individual concerned is unlikely to be able to provide consent physically or legally; if you are able to gain consent then this legal basis will not apply). | **Tick or leave blank** |
| [ ]  |
| **How will you protect the vital interests of the data subject or another natural person by undertaking this activity?**Click here to enter text. |
| 1. **IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER**

(This is different to 6 c). If you are processing data using this basis for its lawfulness then you should be able to identify a specific task, function or power that is set out in law. The processing must be necessary, if not then this basis does not apply). | **Tick or leave blank** |
| [x]  |
| **What statutory power or duty does the Controller derive their official authority from?**Click here to enter text. |
| 1. **IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY**

(Public authorities can only rely on legitimate interests if they are processing for a legitimate reason other than performing their tasks as a public authority. See the guidance for more information about the legitimate interest test). | **Tick or leave blank** |
| [ ]  |
| **What are the legitimate interests you have?**Click here to enter text. |

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| Article 9 (2) conditions are as follows: |
| 1. **THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT**

(Requirements for consent are the same as those detailed above in section 1.2, a)) | **Tick or leave blank** |
| [ ]  |
| 1. **FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION**

(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available). | **Tick or leave blank** |
| [ ]  |
| 1. **IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON WHERE THEY ARE PHYSICALLY OR LEGALLY INCAPABLE OF GIVING CONSENT**

(Requirements for this are the same as those detailed above in section 1.2, d)) | **Tick or leave blank** |
| [ ]  |
| 1. *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*
 | *NA* |
| 1. *The data has been made public by the data subject*
 | *NA* |
| 1. *For legal claims or courts operating in their judicial category*
 | *NA* |
| 1. **SUBSTANTIAL PUBLIC INTEREST**

(Schedule 1, part 2 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available). | **Tick or leave blank** |
| [ ]  |
| 1. **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**

(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available). | **Tick or leave blank** |
| [x]  |
| 1. **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**

(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available). | **Tick or leave blank** |
| [ ]  |
| 1. **PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH**[ARTICLE 89](https://gdpr.eu/article-89-processing-for-archiving-purposes-scientific-or-historical-research-purposes-or-statistical-purposes)**(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). | **Tick or leave blank** |
| [ ]  |

**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 j). NOTE: d), e) and f) are not applicable** |
| **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** |
| Participating GP Practices | Sole Controller |
| Oberoi Consulting | 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. |

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| **Describe exactly what is being processed, why you want to process it and who will do any of the processing?**Severe asthma is a **complex condition** and may be driven by **different inflammatory pathways**. Patients with **severe forms of asthma** face **substantial burden of illness**, **marked reductions in quality of life**, and require a **significant amount of health resource**.**Primary Care clinicians** can play an **important** role in **identifying patients** that **potentially** have **severe asthma** as it can be a **life-threatening** and **debilitating condition** that requires **expert input** to **confirm the diagnosis** and **appropriate management.** SPECTRA as a service for primary care clinical system resources have been developed to help the GPs to identify adults with potential severe asthma, optimise treatment and, where required, refer them to severe asthma centres. Where a Practice/PCN/CCG/ASHN is in interested in tracking progress periodically, the search results from the SPECTRA searches can be uploaded to the SPECTRA website by the practice. The SPECTRA website uses the search results to populate dashboards and reports (this contains NO PERSONAL OR PATIENT IDENTIFIABLE DATA).These reports and dashboards allow practices to track progress and view results in a visual format alongside relevant guidance and recommendations on what to do with specific cohorts of patients.  |
| **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)Click here to enter text. |
| **How are you satisfying the common law duty of confidentiality?**No disclosure due to anon/pseudo actions**If you have selected an option which asks for further information please enter it here**Click here to enter text. |
| **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. |
| **Tick here if you are intending to use any information for a purpose that isn’t considered as direct patient care.** [x] **If so describe that purpose.**1. Direct Care Purpose – GP practices use SPECTRA to identify the cohort of patients who may have severe asthma for further care and treatment.
2. Secondary Purpose - upon registration the practice agrees to sharing of numerical aggregated data with their PCN/Cluster, CCG/HSCP/UHB/AHSN and AstraZeneca. Patient numbers between 1 and 7 are suppressed, aligned to NHS Digital's approach to suppression of small patient counts. None of the parties will be able to identify any patients from this data.
 |
| **Approximately how many people will be the subject of the processing?**1000 plus |
| **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.)Other method not listed Choose an item. Choose an item.**If you have selected ‘other method not listed’ describe what that method is.**GP practices upload search results to SPECTRA website |
| **How will you edit the data?**N/a |
| **How will you quality check the data?**N/a |
| **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.** |
| **What training is planned to support this activity?**1. Instruction guides available via SPECTRA website for GP practices.2. Individuals who are directly involved in processing data as part of this project will be up to date with their mandatory Information Governance training.  |
| Linkage, Data flows, Sharing and Data Opt Out, Sharing Agreements, Reports, NHS Digital |
| **Are you proposing to combine any data sets?**No**If yes then provide the details here.** |
| **What are the Data Flows?** (Detail and/or attach a diagram if you have one).* GP practices to register on SPECTRA web portal provided by Oberoi Consulting to download searches for GP clinical systems.
* GPs to import searches onto clinical systems
* GPs to run searches on the clinical system to produce search results
* GP practice upload search results (numbers of patients identified. This contains aggregated statistical data with low numbers suppressed) to the SPECTRA website to produce a practice report
* The search results populate PCN/Cluster/UHB/AHSN and AstraZeneca level reporting.
* NO PERSONAL OR PATIENT IDENTIFIABLE DATA IS INCLUDED IN THE REPORTS OR ONLINE DASHBOARDS
 |
| **What data/information are you planning to share?**As in 2.2 above |
| * 1.

**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. |
| **Who are you planning to share the data/information with?**Oberoi Consulting Ltd as providers of SPECTRA web portalGP Practices PCNsOxfordshire CCGHealth and Social Care PartnershipUniversity Health BoardAcademic and Health Science NetworkAstraZeneca.Patient numbers between 1 and 7 are suppressed, aligned to NHS Digital's approach to suppression of small patient counts. None of the parties will be able to identify any patients from this data. Any further sharing and publication of data will be in line with ICO’s anonymisation code of practice.   |
| **Why is this data/information being shared?**The purpose for sharing is for indirect care of the patient.To help organisations with resource and strategic planning as well as assessment of the service. |
| **How will you share it?** (Consider and detail all means of sharing)Numerical aggregated low numbers data will be shared with practices respective PCN/Cluster, CCG/HSCP/UHB/AHSN and AstraZeneca via the SPECTRA portal.**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. |
| **What data sharing agreements are or will be in place?**1. Clinicians will register on the <https://suspected-severe-asthma.co.uk/>

By registering they will agree to the service terms and conditions [https://suspected-severe-asthma.co.uk/downloads/GB-27818\_-\_Terms\_&\_Conditions.pdf](https://suspected-severe-asthma.co.uk/downloads/GB-27818_-_Terms_%26_Conditions.pdf)1. Contractual agreement in place between individual practices upon registration and Oberoi Consulting which is the data processor in this initiative.
 |
| **What reports will be generated from this data/information?**Reports and dashboards will be generated for the participating General Practices based on the data file uploaded from the SPECTRA clinical system searches. This contains no personal or patient identifiable data. |
| **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.**Oberoi Consulting; 20 St Christopher's Way, Derby DE24 8JYClick 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** |
| Oberoi Consulting | Yes | Z9081488**Registration expires:**06 June 2022 |
| 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. |
| 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. |

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| **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** |
|   |   |
| GP practices & Oberoi Consulting  | A data processing agreement upon registration to the SPECTRA portal |
| Click here to enter text. | Click here to enter text. |
| Click here to enter text. | Click here to enter text. |
| Click here to enter text. | Click here to enter text. |
| Click here to enter text. | Click here to enter text. |

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| **3.4****What is the status of each organisation’s Data Security Protection Toolkit?**[DSP Toolkit](https://www.dsptoolkit.nhs.uk/OrganisationSearch)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** |
| Oberoi Consulting | 8HX55 | Standards Met | 16/06/21 |
| Click here to enter text. | Click here to enter text. | Click here to enter text. | Click here to enter text. |
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| **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).Oberoi Consulting UK Cloud Based Servers - Slough, Berkshire and Maidenhead, Berkshire.  |
| **3.6****How is the data/information accessed and how will this be controlled?**Data will be accessed through web portal. Only registered participants will be able to access the data via a username and password. |
| **3.7****Is there any use of Cloud technology?**Yes**If yes add the details here.**Oberoi Consulting UK Cloud Based Servers - Slough, Berkshire and Maidenhead, Berkshire.  |
| **3.8****What security measures will be in place to protect the data/information?**Password protection, 2 user factor authentication to access servers. Daily back up.**Is a specific System Level Security Policy needed?**NoIf 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?**Clinicians will register on the <https://suspected-severe-asthma.co.uk/>By registering they will agree to the service terms and conditions https://suspected-severe-asthma.co.uk/downloads/GB-27818\_-\_Terms\_&\_Conditions.pdf |
| 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).N/a |
| **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 individual rights will be affected as no personal or patient identifiable data is extracted nor processed. |
| **4.3****How long is the data/information to be retained?**As per the Records Management Code of Practice, NHSx |
| **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 per approved internal organisational process. |
| **4.6****What will happen to the data/information if any part of your activity ends?**Data will be destroyed as per organisational destruction process.  |
| **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**  |
|   |   |   |   |
| No Risks identified as the data shared outside of the GP practice is fully aggregated low numbers suppressed (1-7) statistical data only | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |

 |
| **5.2**

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| **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)** |
|   |   |   |   | Choose an item. |
| Data processed and shared outside of the respective GP practices must be in line with the Information Commissioner Office’s anonymisation code of Practice. This includes any published data.  | Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |

 |
| **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?**None |
| 6. Consultation |
| **6.1****Have you consulted with any external organisation about this DPIA?**No**If yes, who and what was the outcome? If no, detail why consultation was not felt necessary.**Click here to enter text. |
| **6.2****Will you need to discuss the DPIA or the processing with the Information Commissioners Office?** (You may need the help of your DPO with this)No**If yes, explain why you have come to this conclusion.**Click here to enter text. |
| 7. Data Protection Officer Comments and Observations |
| **7.1****Comments/observations/specific issues** | 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**AHSN to address further comments made on the DPIA**We believe there are** Choose an item.**If you have selected item B) or C) then list these in the amber boxes below and then consider additional measures you could take and include these in the green boxes below**

|  |  |  |  |
| --- | --- | --- | --- |
| **Residual risks and nature of potential impact on individuals.** (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).  | **Likelihood of harm**  | **Severity of harm**  | **Overall risk**  |
| Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |

|  |
| --- |
| **Additional measures you could take to reduce or eliminate residual risks identified as medium or high risk above (B and C)** |
| **Risk**  | **Options to reduce or eliminate risk**  | **Effect on risk**  | **Residual risk**  | **Measure approved (SIRO)** |
| Click here to enter text. | Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |
| Click here to enter text. | Click here to enter text. | Choose an item. | Choose an item. | Choose an item. |

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| Signed and approved on behalf of 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.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. |