



Data Protection Impact Assessment (DPIA) Flowchart

Is your activity High Risk? E.g. do you want to:

- Install CCTV
- Store data in the Cloud
- Collect fingerprints
- Transfer data to another system
- Set up remote access to systems
- Use technology that monitors or tracks students or employees

Yes →

No →

You do not need to carry out a DPIA, however you should:

- Consult your Data Protection Officer
- Identify and record your legal basis for processing the personal data
- Check your privacy notices cover the activity
- Limit the personal data being used to what is strictly necessary
- Ensure any storage, transmission or transfer is secure
- Carry out due diligence checks and obtain contracts with any data processors used

Could the activity cause an impact to data subjects? E.g.

- Could they suffer discrimination; identity theft or fraud; financial loss; reputational damage; physical harm or loss of confidentiality **if a breach occurred?**
- Will it stop them from exercising their privacy or other legal rights?
- Will it inhibit their ability to access services or opportunities?
- Could they lose control over the use of their data?
- Will they suffer significant economic or social disadvantage?

Yes →

No ←

You need to carry out a DPIA and record your findings:

- Describe what you want to do and why
- Describe the personal data to be used and who & how many people it will affect
- Describe how you will comply with the data protection principles
- Identify the potential risks
- Assess the impact of those risks
- Describe the actions you will put in place to reduce the likelihood of the risks
- Assess the remaining risk level after actions are carried out
- Consult with relevant experts or stakeholders as necessary
- Obtain your DPO's views
- Record senior management's decision as to whether to go ahead with the activity

