

Data Protection Impact Assessment Checklist

The GDPR requires that organisations carry out a data protection impact assessment (DPIA) when processing is likely to result in a high risk to the rights and freedoms of data subjects. For a parish examples might include, introducing a new safeguarding protocol which involves sharing data with multiple agencies or using CCTV to monitor public areas.

If two or more of the following apply, it is likely that you will be required to carry out a DPIA. This does not apply to existing systems but would apply if you introduced a new system.

1. Profiling is in use. Example: you monitor website clicks or behaviour and record people's interests, or marketing profiles based on navigation on websites.	<input type="checkbox"/>
2. Automated-decision making. Example: when processing leads to the potential exclusion of individuals.	<input type="checkbox"/>
3. CCTV or systematic surveillance of public areas. Processing used to observe, monitor or control data subjects.	<input type="checkbox"/>
4. Sensitive data. Examples: information about individuals' political opinions, as well as personal data relating to criminal convictions or offences.	<input type="checkbox"/>
5. Large scale data processing. There is no definition of "large scale". However, consider the number of data subjects concerned, the volume of data, the duration processing, the geographical extent and/or the range of different data items being processed.	<input type="checkbox"/>
6. Linked databases - in other words, data aggregation. Example: two datasets merged together, that could "exceed the reasonable expectations of the user". E.g. you merge your mailing list with another organisation.	<input type="checkbox"/>
7. Data concerning vulnerable data subjects, especially when power imbalances arise, e.g. employee-employer, where consent may be vague, data of children, mentally ill, asylum seekers, elderly, patients.	<input type="checkbox"/>
8. "New technologies are in use". E.g. use of social media, "Internet of Things" etc.	<input type="checkbox"/>
9. Data transfers outside of the EU.	<input type="checkbox"/>
10. "Unavoidable and unexpected processing". For example, processing performed on a public area that people passing by cannot avoid. Example: Wi-Fi tracking, processing that aims at allowing, modifying or refusing data subjects' access to a service or entry into a contract.	<input type="checkbox"/>

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Questions to be used to assess whether a DPIA is necessary.

1. What is the objective/intended outcome of the project?
2. Is it a significant piece of work affecting how services/operations are currently provided?
3. Who is the audience or who will be affected by the project?
4. Will the project involve the collection of new information about people? (*e.g. new identifiers or behavioural information relating to individuals?*)
5. Will the project involve combining anonymised data sources in a way that may give rise to a risk that individuals could be identified?
6. Will the project involve combining datasets originating from different processing operations or data controllers in a way which would exceed the reasonable expectations of the individuals?
7. Is data being processed on a large scale?
8. Will the project compel individuals to provide information about themselves?
9. Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
10. Will personal information be transferred outside the EEA?
11. Is information about individuals to be used for a purpose it is not currently used for, or in a way it is not currently used?
12. Will information about children under 16 or other vulnerable persons be collected or otherwise processed?
13. Will new technology be used which might be seen as privacy intrusive? (*e.g. tracking, surveillance, observation or monitoring software, capture of image, video or audio or location*)
14. Is monitoring or tracking or profiling of individuals taking place?
15. Is data being used for automated decision making with legal or similar significant effect?
16. Is data being used for evaluation or scoring? (*e.g. performance at work, economic situation, health, interests or behaviour*)
17. Is sensitive data being collected including: Race, Ethnic origin, Political opinions, Religious or philosophical beliefs, Trade union membership, Genetic data, Biometric data (including facial recognition), Finger or palm print data, Health data, Data about sex life or sexual orientation?
18. Will the processing itself prevent data subjects from exercising a right or using a service or contract?
19. Is the information about individuals of a kind likely to raise privacy concerns or is it information people would consider to be particularly private or confidential?
20. Will the project require contact to be made with individuals in ways they may find intrusive?

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DPIA Assessment Questionnaire	NOTES	RESPONSE
1. Does the project apply new or additional information technologies that have substantial provision for privacy intrusion?	Examples include, but are not limited to, smart cards RFID tags, locator technologies including mobile phone locations, applications of GPS, visual surveillance, digital imaging and video recording.	Yes / No / N/A
2. Does the project involve new identifier, re-use of identifiers, or intrusive identification, identity, authentication or identity management processes?	Examples include digital signature initiative, multipurpose identifier, interviews and presentation of identity documents as part of a registration scheme and an intrusive identifier such as biometrics.	Yes / No / N/A
3. Might the project have the effect of denying anonymity and pseudonymity, or converting transactions that previously be conducted anonymously or pseudonymously into identified transactions?		Yes / No / N/A
4. Does the project involve multiple organisations, whether they are government agencies or private sector organisations?		Yes / No / N/A
5. Does the project involve a new or significantly changed handling of personal data that is of particular concern to the individuals?		Yes / No / N/A
6. Does the project involve new or significantly changed handling of a considerable amount, or personal data about each individual in the database?		Yes / No / N/A
7. Does the project involve new or significantly changed handling of personal data about a large number of individuals?		Yes / No / N/A
8. Does the project involve new or significantly changed consolidation, interlinking, cross- referencing or matching or personal data from multiple sources?		Yes / No / N/A
9. Does the project relate to data processing, which is in any way exempt from legislative privacy protections?	Examples include law enforcement and national security information systems and also other schemes where some or all of the privacy protections have been	Yes / No / N/A

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DPIA Assessment Questionnaire	NOTES	RESPONSE
	negated by legislative exemptions or exceptions.	
10. Does the project's justification include significant contributions to public security measures?		Yes / No / N/A
11. Do any of the following apply?		
(a) Is genetic or health data is used?		Yes / No / N/A
(b) When private data is collected from third parties is the data used to decide whether to allow or deny access to a service (e.g. automatic decision making)?		Yes / No / N/A
(c) Is data used to profile the user, to assess "risk"?		Yes / No / N/A
(d) Does the data processing carry a risk to the physical health of the user/person?		Yes / No / N/A
(e) If sensitive personal data is used, is it used for other purposes than those they were initially collected? "Sensitive personal data" includes race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (including facial recognition), finger or palm print data, health data, data about sex life or sexual orientation		Yes / No / N/A
(f) Do you communicate, disclose or make publicly available data related to a large number of people?		Yes / No / N/A
(g) Is there is a need to assess and process private personal aspects, for example for producing analyses based on: economic status, health, personal preferences, interests, reliability, behaviour, location data, travel patterns?		Yes / No / N/A
(h) Is profiling is used on a large scale?		Yes / No / N/A
(i) Are there projected common applications or entire environments for entire large sectors or occupational segments, or cross-functional activities where sensitive data is used. E.g. products used for employee tracking?		Yes / No / N/A
12. What is the objective/intended outcome of the project?		
13. Is it a significant piece of work affecting how services/operations are currently provided?		Yes / No / N/A
14. Who is the audience or who will be affected by the		

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project?		
15. Will the project involve combining anonymised data sources in a way that may give rise to a risk that individuals could be identified?		Yes / No / N/A
16. Will the project involve combining datasets originating from different processing operations or data controllers in a way which would exceed the reasonable expectations of the individuals?		Yes / No / N/A
17. Is data being processed on a large scale?		Yes / No / N/A
18. Will the project compel individuals to provide information about themselves?		Yes / No / N/A
19. Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?		Yes / No / N/A
20. Will personal information be transferred outside the EEA?		Yes / No / N/A
21. Is information about individuals to be used for a purpose it is not currently used for, or in a way it is not currently used?		Yes / No / N/A
22. Will information about children under 16 or other vulnerable persons be collected or otherwise processed?		Yes / No / N/A
23. Will new technology be used which might be seen as privacy intrusive? (e.g. tracking, surveillance, observation or monitoring software, capture of image, video or audio or location)		Yes / No / N/A
24. Is monitoring or tracking or profiling of individuals taking place?		Yes / No / N/A
25. Is data being used for automated decision making with legal or similar significant effect?		Yes / No / N/A
26. Is data being used for evaluation or scoring? (e.g. performance at work, economic situation, health, interests or behaviour)		Yes / No / N/A