The *General Data Protection Regulation* and *Data Protection Act 2018* identify certain types of processing activities which are likely to result in a high risk to individuals. This checklist should assist you in identifying whether your personal data processing is **high risk**. If so, a Data Protection Impact Assessment (DPIA) must be completed.

**Step 1: Data Information**

|  |  |
| --- | --- |
| **Which department will process the data?** |  |
| **Name and job title of the responsible person** |  |
| **What data will be processed?** |  |
| **How will the data be used?** |  |
| **How will the data benefit the College, individuals and/or other parties?** |  |
| **Date assessment completed** |  |

**Step 2: Type ‘A’ Data Processing**

**Will the data be used in any of the following ways?**

*To provide answers to each question, click on the box to insert an automated x.*

|  |  |
| --- | --- |
| **Type of Processing** *(Non-exhaustive examples are given in italic)* | **Yes/No** |
| 1. **Decisions about an individual’s access to a product, service, opportunity or benefit which are based to any extent on automated decision-making (including profiling).**  * *A student is automatically excluded from Cambridge Bursary Scheme’s list of eligible applicants if the Student Loans Company (SLC) rejects them* | Yes  No |
| 1. **Decisions about an individual’s access to a product, service, opportunity or benefit which involves the processing of special category data.**  * *Eligibility for hardship funds, grants in relation to a disability, etc.* * *Room allocation based on students’ special needs (religious, medical etc.)* * *Special pensions benefits for staff due to disability* * *Occupational health management* * *Adjustments for exams due to special needs (religious, medical etc.)* | Yes  No |
| 1. **Any profiling of individuals on a large scale.**   *Processing may be on a large scale where it involves: a wide range or large volume of personal data; takes place over a large geographical area; affects a large number of people; is extensive; or has long-lasting effects:*   * *Social-media networks* * *Voluminous mailshot (marketing)* * *Wealth screening of alumni* * *Applying AI to an existing process* | Yes  No |
| 1. **Combining, comparing or matching personal data obtained from multiple sources.**  * *Direct marketing* * *Wealth screening of alumni* * *Other assessments of how alumni can engage more closely with the College* * *Student admissions decisions (combining UCAS data with direct application forms, pre-admissions tests, and College-generated interview scores)* | Yes  No |
| 1. **Using the personal data of children (i.e. under 13) or other vulnerable individuals for marketing purposes, profiling or other automated decision-making**   *The College is unlikely to be involved in this type of processing, except possibly in outreach work. Check with the College Data Protection Lead if in doubt* | Yes  No |
| 1. **Using the personal data of children (i.e. under 13) to offer them online services directly**   *The College is unlikely to be involved in this type of processing but consider any online learning tools you may provide to schools in outreach activities.* | Yes  No |
| 1. **Where the processing is of such a nature that a personal data breach could jeopardise the physical health or safety of individuals.**  * *Students/staff with safeguarding issues* * *Social care records* * *Complaint procedures or disciplinary action, especially where one member of College makes an accusation against another member of College* | Yes  No |

|  |
| --- |
| If you answered **Yes** to **ANY** of the categories listed above, a **DPIA IS REQUIRED.**  Please send this form to the College Data Protection Lead to complete Step 4 of this form.  If you answered **NO** to **all** of the above categories, please proceed to Step 3. |

**STEP 3: Type ‘B’ Processing**

**Will the processing involve using personal data in any of the following ways?**

|  |  |  |
| --- | --- | --- |
| **Type of Processing** *(Non-exhaustive examples are given in italic)* | | **Yes/No** |
| 1. **Processing involving the use of new technologies, or the novel application of existing technologies and/or organisational solutions (including AI).**  * *Migration in Colleges from a shared drive system to a hosted document management system, such as SharePoint or Moodle.* | | Yes  No |
| 1. **Any processing of biometric data for the purpose of uniquely identifying an individual.**  * *Using facial recognition, voice recognition, fingerprint scanners or iris scanners to open doors, unlock devices or decrypt computer files.* | | Yes  No |
| 1. **Invisible processing, i.e. processing of personal data that has not been obtained direct from the data subject in circumstances where the controller considers that informing them would prove impossible or involve disproportionate effort.**  * *Crime prevention or detection measures (including police liaison)* * *Initial stages of wealth screening* * *Fraud prevention* * *An insurance purpose (e.g. evidence retention)* * *Identifying or keeping under review the existence or absence of equality of opportunity or treatment of one or more protected characteristics (or special categories of data)*   *The Office of Intercollegiate Services has compiled a document that outlines all known instances of invisible processing in Colleges. This is available on request.* | Yes  No | |
| 1. **Processing which involves tracking a person’s geolocation data or behaviour, including but not limited to the online environment.**  * *Social networks, software applications* * *Wi-Fi, web and cross-device tracking* * *CCTV monitoring* * *Processing location data of employees, e.g. card or key fob entry systems, home and remote working.* | Yes  No | |

|  |
| --- |
| If you answered **‘Yes’** to only **ONE** of the categories above, you are **NOT required** to carry out a DPIA. However, the Information Commissioner advises data controllers to consider a DPIA for good information governance assurances.  If you answered **‘Yes’** to **TWO** or more of the categories above, a DPIAis **REQUIRED**.  Please send this form to the College Data Protection Lead who will complete **Step 4** to decide whether to trigger a DPIA. |

**Step 4: The Decision (To be determined by the College Data Protection Lead.)**

**Based on the above information, I conclude that a Data Protection Impact Assessment is:**

**REQUIRED**  **NOT REQUIRED**

**Name:**

**Position (if not the College Data Protection Lead):**

**Signature:** **Date:**

If a **DPIA is NOT REQUIRED –** send this form to the Compliance Officer for College records,noting that it may need reviewing if the processing changes.