

DPIA Policy & Checklist

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A Data Protection Impact Assessment (DPIA) is required to be filled in under certain circumstances.

Failure to adequately conduct a DPIA where appropriate is a breach of the GDPR and could lead to fines of up to 2% of an organisation's annual global turnover or €10 million – whichever is greater.

If the work you are involved with relates to any of the statements listed below, please fill in a DPIA form to be signed off by your Line Manager prior to commencement of *any* data processing.

A DPIA form must also be completed in the event that there is an adjustment to the scope, perceived risk, or context of any data processing you are already engaged with.

If you do need to fill in a DPIA form, please use this link to create a copy of the form ready to be filled in:

https://docs.google.com/document/d/1at27q1oldWf8NKz2Gz_o4MDchDWmEOhpoKkEXrWH1N8/copy

When must I use a DPIA?

You must carry out a DPIA if you plan to:

- Use systematic and extensive profiling or automated decision-making to make significant decisions about people.
- Process special category data or criminal offence data on a large scale.
- Use new technologies.
- Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit.
- Carry out profiling on a large scale.
- Process biometric data.
- Combine, compare or match data from multiple sources.
- Process personal data without providing a privacy notice directly to the individual.
- Process personal data in a way which involves tracking individuals' online or offline location or behaviour.
- 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 which could result in a risk of physical harm in the event of a security breach.


Other times I must consider using a DPIA

You must consider carrying out a DPIA if you plan to carry out any other:

- Evaluation or scoring.
- Automated decision-making with significant effects.
- Processing of sensitive data or data of a highly personal nature.
- Processing on a large scale.
- Processing of data concerning vulnerable data subjects.
- Innovative technological or organisational solutions.
- Processing involving preventing data subjects from exercising a right or using a service or contract.

If you decide not to carry out a DPIA despite having acknowledged one or more of the above in the work you are involved with, you will document your reasons and submit them to your Line Manager. Failure to either submit a DPIA or your reasons for not submitting a DPIA to your Line Manager after acknowledging one of the above cases will result in the college's Disciplinary Procedures being put into effect.

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