

Information Compliance

Data Protection Impact Assessments

4.2 Pre-assessment

The pre-assessment questionnaire is used to conduct a high-level analysis of the project or application. The answers will assist the DPO to determine if a full DPIA is required.

The pre-assessment questionnaire is available on the intranet at https://intra.brunel.ac.uk/s/GILO/Information%20Compliance/Data%20Protection/Pages/Policies-Procedures-Guidance.aspx.

Upon completion, the pre-assessment questionnaire must be sent to the DPO at <u>data-protection@brunel.ac.uk</u>. The DPO will notify the person completing the pre-assessment questionnaire if a full DPIA is required.

Even if a full DPIA is not required, should there be any redesign or other changes to the scope of the project, the answers to the pre-assessment questionnaire should be reviewed to determine if a full DPIA should, in fact, be conducted. Revised pre-assessment questionnaires must be sent to the DPO as above, with a short explanation of the reasons for the revision.

4.3 Full DPIA

The project sponsor may decide a full DPIA is required, the DPO may advise that one is needed, or one can be conducted because it is good practice to do so.

The template for a full DPIA can be found on IntraBrunel at the URL in the previous section.

There are six steps to a DPIA:

1. Identify the need for a DPIA

If the project is a major one, involves a high risk to personal data, or the DPO has recommended a DPIA be conducted, then this step can be skipped. Otherwise, indicate what the project is intended to achieve, and what uses of personal data are involved.

2. Describe the processing

This step asks for detailed information regarding the personal data which is intended to be used.

3. Consultation process

It is often useful to have a consultation with a representative group of stakeholders, especially those whose personal data may be used. If no consultation is anticipated, the reasons for not doing so should be noted in this section.

If consultation is to take place, no further work on the DPIA or the project should take place until that is complete, and the responses have been analysed. It may be necessary to tweak the project design based on the responses, and this will have an effect on the rest of the DPIA.

4. Assess necessity and proportionality

This step addresses the legal basis for using personal data, privacy notices, retention schedules, and individuals' rights.

6 Register and publication

The DPO has established a register for recording 1

Information Commissioner's Office: https://ico.org.uk/for-organisations/guide-to-data-protection-regulation-gdpr/

Cyber & Information Security ISMS Policies and Procedures:

https://intra.brunel.ac.uk/s/cc/security/cyber-security/Cyber%20Documents/Forms/AllItems.aspx

For further guidance:

email: data-protection@brunel.ac.uk

web page: http://www.brunel.ac.uk/about/administration/information-access/data-protection