NHS
Buckinghamshire, Oxfordshire and Berkshire West
Integrated Care Board

Data Protection Impact Assessment (DPIA) Template

A DPIA is designed to describe your processing and to help manage any potential harm to individuals' in the use of their information. DPIAs are also important tools for demonstrating accountability, as they help you as a Controller to comply with the requirements of the Data Protection Legislation. Non-compliance with DPIA requirements can lead to fines imposed by the Information Commissioners Office (ICO); this includes not carrying out a DPIA at all, carrying out a DPIA in an incorrect way or failing to consult the ICO where required.

DPIA's are not new; the use of Privacy Impact Assessments has become common practice in the NHS and can provide evidence of compliance within the Data Security and Protection toolkit (DSPT); DPIAs build on that practice.

It is not always clear whether you should do a DPIA or not but there are a number of situations where a DPIA **should** be considered or where a DPIA is a **legal requirement**. If you can tick against the criteria below it is highly recommended that you undertake a DPIA and if you decide not to, ensure that you document the reasons for your decision.

You as Controller **MUST** carry out a DPIA where you plan to:	Tick or leave blank
Use **profiling or automated decision-making** to make significant decisions about people or their access to a service, opportunity or benefit;	☐
Process **special-category data or criminal-offence data on a large scale**;	✓
Monitor a publicly accessible place on a large scale;	☐
Use **innovative technology** in combination with any of the criteria in the European guidelines;	☐
Carry out **profiling** on a large scale;	☐
Process biometric or genetic data in combination with any of the criteria in the European guidelines;	☐
Combine, compare or match data from multiple sources;	☐
Process personal data **without providing a privacy notice** directly to the individual in combination with any of the criteria in the European guidelines;	✓
Process personal data in a way that involves **tracking** individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines;	☐
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 that could result in a **risk of physical harm** in the event of a security breach.	☐

You as Controller should **consider** carrying out a DPIA where you	Tick or leave blank
Plan any major project involving the use of personal data;	☐
Plan to do evaluation or scoring;	☐
Want to use systematic monitoring;	☐
Process sensitive data or data of a highly personal nature;	✓
Processing data on a large scale;	✓
Include data concerning vulnerable data subjects;	☐
Plan to use innovative technological or organisational solutions;	☐

A new DPIA should be carried out if you decide that there is a significant enough change to what you originally intended but it is good practice for DPIAs to be kept under review and revisited when necessary.

There is guidance to help you. Your Data Protection Officer (DPO) can be consulted before completing a DPIA in order to provide specialist advice and guidance or simply to talk things through with you.

Background Information	
Date of your DPIA :	13/09/2022
Title of the activity/processing:	dPCP Data Extraction – usage of template
Who is the person leading this work?	[redacted], GP Clinical Lead for IT, BOB
Who is the Lead Organisation?	Buckinghamshire, Oxfordshire, Berkshire West ICB
Who has prepared this DPIA?	[redacted], Head of Central Reporting and Analytics, SCW
Who is your Data Protection Officer (DPO)?	[redacted]
Describe what you are proposing to do: (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	Data is needed for ICB to understand which practices still use the dPCP (digital Proactive Care Plan), which version and how often in order to guide commissioning decisions. To be able to provide this report, the PCA team will need information accessible at PID level. The data will be pulled using the anonymised identifier in EMIS for Oxfordshire practices only, and one data item (the code which records the version control of the template) will be exported with its code-associated-text. Code-associated-text potentially contains sensitive information and cannot be filtered within the EMIS environment. The information could be sensitive as it is a free text field meaning there is a minor risk that a GP or individual recording the data may write some subjective information here or accidentally write something. As this cannot be mitigated within the EMIS environment the PCA Analyst will export the data from EMIS and process the data to ensure any sensitive data is removed. Previous experience with prospective audit by Dr Tom Nichols (under OCCG) of sensitive data against this code found that sensitive data may exist against this code, but only under very rare circumstances and its nature is not highly sensitive. These data have previously been extracted and processed in this way, during the Pandemic. The categories the analysis will focus are similar to the below, thus have no patient specific sensitive data – the data extract will be inclusive only of data which match the expected code-associated-free-text:

	All data relating to patients extracted with: ***'Data_entry_using_dPCP_template_Associated_Text':*** data entered using dPCP data entry template data entered using dPCP data entry template - COVID19-dPCP: Ceilings of Treatment (EMIS Web) v0 data entered using dPCP data entry template (EMIS Web v1.1) data entered using dPCP data entry template (EMIS Web v1.3) data entered using dPCP data entry template (EMIS Web v1.5) data entered using dPCP data entry template (EMIS Web v1.6) data entered using dPCP data entry template (EMIS Web v1.8) data entered using dPCP data entry template (EMIS Web v2.0) data entered using dPCP data entry template (EMIS Web v2.2 zap) data entered using dPCP data entry template (EMIS Web v2.2) data entered using dPCP data entry template (EMIS Web v2.3) data entered using dPCP data entry template (EMIS Web v3.0 zap) data entered using dPCP data entry template (EMIS Web v3.0) data entered using dPCP data entry template (EMIS Web v3.0.1 zap) data entered using dPCP data entry template (EMIS Web v3.0.1) data entered using dPCP data entry template (EMIS Web v3.0.2 zap) data entered using dPCP data entry template (EMIS Web v3.0.2) data entered using dPCP data entry template (EMIS Web v3.0.3) data entered using dPCP data entry template (EMIS Web) This will result in minor, acceptable data loss for the PCA team regarding the extracted data from EMIS if a practice has altered their template.
Are there multiple organisations involved? (If yes – you can use this space to name them, and who their key contact for this work is)**.**	Yes, GP practices in Oxfordshire as Data Controllers, SCW as Data Processor and BOB ICB as requestor for the extract. Key contacts: [redacted] (GP clinical lead for IT, BOB) – Providing advice and support to requestor [redacted] (Project Manager End of Life care and long-term conditions for Oxfordshire and Buckinghamshire) – Requestee
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).	No
Detail anything similar that has been undertaken before?	This extract process, for the same purpose, was undertaken in April-20. A short form DPIA (applicable during COVID response) was completed.

1. Categories, Legal Basis, Responsibility, Processing, Confidentiality, Purpose, Collection and Use

1.1.

What data/information will be used? Tick all that apply.	Tick or leave blank	**Complete**
Personal Data	☐	1.2
Special Categories of Personal Data	☐	1.2 AND 1.3

Personal Confidential Data	✓	1.2 AND 1.3 AND 1.6
Sensitive Data (usually criminal or law enforcement data)	✓ P	1.2 but speak to your IG advisor first
Pseudonymised Data	☐	1.2 and consider at what point the data is to be pseudonymised
Anonymised Data	✓	Consider at what point the data is to be anonymised
Commercially Confidential Information	☐	Consider if a DPIA is appropriate
Other	☐	Consider if a DPIA is appropriate

1.2.

Processing has to be lawful so identify which of the following you believe justifies what you are proposing to do and include an explanation as to why in the relevant box. You must select at least one from a – f.

Article 6 (1) of the GDPR includes the following:

a) THE DATA SUBJECT HAS GIVEN CONSENT	**Tick or leave blank**
	☐

Why are you relying on consent from the data subject?
Click here to enter text.

What is the process for obtaining and recording consent from the Data Subject? (How, where, when, by whom).
Click here to enter text.

Describe how your consent form is compliant with the Data Protection requirements? (There is a checklist that can be used to assess this).
Click here to enter text.

b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY (The contract needs to be between the Controller and the individual and not concern data being processed due to someone else having a contract with the Controller. Processing can happen before the contract is entered into e.g. processing a pre-health assessment for a private or cosmetic procedure that is a paid for service with the delivery of that care done under contract between the Patient and the Practitioner).	**Tick or leave blank** ☐

What contract is being referred to?
Click here to enter text.

c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT (A legal obligation mandates processing of data as a task in itself where there are likely to be legal measures available if not adhered to e.g. an Employer has a legal obligation to disclose salary information to HMRC).	**Tick or leave blank** ☐

Identify the legislation or legal obligation you believe requires you to undertake this processing.
Click here to enter text.

d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON (This will apply only when you need to process data to protect someone's life. It must be necessary and does not only relate to the individual whose data is being processed. It can also apply to protect another person's life. Emergency Care is likely to fall into this category but planned care would not. You may need to process a Parent's data to protect the life of a child. The individual concerned is unlikely to be able to provide consent physically or legally; if you are able to gain consent then this legal basis will not apply).	**Tick or leave blank** ☐

How will you protect the vital interests of the data subject or another natural person by undertaking this activity?
Click here to enter text.

e) IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER (This is different to 6 c). If you are processing data using this basis for its lawfulness then you should be able to identify a specific task, function or power that is set out in law. The processing must be necessary, if not then this basis does not apply).	**Tick or leave blank** ✓ P

What statutory power or duty does the Controller derive their official authority from?

Click here to enter text.	
f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY (Public authorities can only rely on legitimate interests if they are processing for a legitimate reason other than performing their tasks as a public authority. See the guidance for more information about the legitimate interest test).	**Tick or leave blank**
What are the legitimate interests you have? BOB ICB would like to know the value of the dPCP in primary care as-is, as well as what value the web portal offers. A commissioning decision must be made about the timing of the decommissioning of the dPCP Template which is now obsolete, which includes a clinical safety assessment. The Likelihood of the clinical risk depends on the current and trend of use, which requires usage data. The second decision relates to the commissioning of the dPCP web portal, and the timing of decommissioning or maintenance, which will also depend on the usage of the dataset that the dPCP is designed to record.	

Article 9 (2) conditions are as follows:	
a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT (Requirements for consent are the same as those detailed above in section 1.2, a))	**Tick or leave blank** ☐
b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION (Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	**Tick or leave blank** ☐
c) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON WHERE THEY ARE PHYSICALLY OR LEGALLY INCAPABLE OF GIVING CONSENT (Requirements for this are the same as those detailed above in section 1.2, d))	**Tick or leave blank** ☐
d) It is necessary for the operations of a not-for-profit organisation such as political, philosophical, trade union and religious body in relation to its members	*NA*
e) The data has been made public by the data subject	*NA*
f) For legal claims or courts operating in their judicial category	*NA*
g) SUBSTANTIAL PUBLIC INTEREST (Schedule 1, part 2 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	**Tick or leave blank** ☐
h) PROCESSING IS NECESSARY FOR THE PURPOSES OF PREVENTIVE OR OCCUPATIONAL MEDICINE, FOR THE ASSESSMENT OF THE WORKING CAPACITY OF THE EMPLOYEE, MEDICAL DIAGNOSIS, THE PROVISION OF HEALTH OR SOCIAL CARE OR TREATMENT OR THE MANAGEMENT OF HEALTH OR SOCIAL CARE SYSTEMS AND SERVICES ON THE BASIS OF UNION OR MEMBER STATE LAW OR PURSUANT TO CONTRACT WITH A HEALTH PROFESSIONAL AND SUBJECT TO CONDITIONS AND SAFEGUARDS (Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	**Tick or leave blank** ✓ £
i) PROCESSING IS NECESSARY FOR REASONS OF PUBLIC INTEREST IN THE AREA OF PUBLIC HEALTH, SUCH AS PROTECTING AGAINST SERIOUS CROSS-BORDER THREATS TO HEALTH OR ENSURING HIGH STANDARDS OF QUALITY AND SAFETY OF HEALTH CARE AND OF MEDICINAL PRODUCTS OR MEDICAL DEVICES, ON THE BASIS OF UNION OR MEMBER STATE LAW WHICH PROVIDES FOR	**Tick or leave blank** ☐

SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE RIGHTS AND FREEDOMS OF THE DATA SUBJECT, IN PARTICULAR PROFESSIONAL SECRECY (Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	
j) PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH ARTICLE 89(1) BASED ON UNION OR MEMBER STATE LAW WHICH SHALL BE PROPORTIONATE TO THE AIM PURSUED, RESPECT THE ESSENCE OF THE RIGHT TO DATA PROTECTION AND PROVIDE FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE FUNDAMENTAL RIGHTS AND THE INTERESTS OF THE DATA SUBJECT. (Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	**Tick or leave blank**

1.3.

If using special categories of personal data, a condition for processing under Article 9 of the GDPR must be satisfied in addition to a condition under Article 6. You must select at least 1 from a) to c) or g) to i). NOTE: d), e) and f) are not applicable

1.4.

Confirm who the Controller and Processor is/are. Confirm if the Controller/s are solely or jointly responsible for any data processed?

(Identify any other parties who will be included in the agreements and who will have involvement/share responsibility for the data/information involved in this project/activity. Use this space to detail this but you may need to ask your DPO to assist you. Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only).

Name of Organisation	Role
SCW	Processor
GP Practices	Sole Controller
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.

1.5.

Describe exactly what is being processed, why you want to process it and who will do any of the processing?

dPCP data is being extracted by SCW PCA team for evaluation and commissioning purposes

1.6.

Tick here if you owe a duty of confidentiality to any information. ✓

If so, specify what types of information. Likely to be clinical, however it is a free text area the GP can write in so could contain non-clinical sensitives. The extraction, although anonymised at patient level, includes code-associated-free-text fields attached to codes which are highly unlikely to include personal information, but they still technically could. There isn't in EMIS search/reporting to allow filtering of the free text in the 'associated text' field. Once the data is extracted the Analyst will only filter on categories stated on page 3 and remove records not required.
Click here to enter text.

1.7.

How are you satisfying the common law duty of confidentiality?
No disclosure due to anon/pseudo actions

If you have selected an option which asks for further information please enter it here
Click here to enter text.

1.8.
Are you applying any anonymisation/pseudonymisation technique or encryption to any of the data to preserve the confidentiality of any information?
Yes

If you are then describe what you are doing.
EMIS Population Reporting allows for anonymised and pseudo anonymised option for patient level data extraction.

If you don't know then please find this information out as there are potential privacy implications with the processing.

1.9.
Tick here if you are intending to use any information for a purpose that isn't considered as direct patient care. ✓

If so describe that purpose.
Yes – commissioning decisions about care support tool commissioning

1.10.
Approximately how many people will be the subject of the processing?
GP Practice population

1.11.
How are you collecting the data? (e.g. verbal, electronic, paper (if you need to add more selections then copy the last 'choose an item' and paste, the text has been left unlocked for you to do this.)
Other method not listed
Choose an item.
Choose an item.
Choose an item.
Choose an item.

If you have selected 'other method not listed' describe what that method is.
Data extraction from EMIS

1.12.
How will you edit the data?
Through SQL processing.

1.13.
How will you quality check the data?
The Analyst writing the report will run a Data Quality Check and remove any sensitive data. Then the report will be Data Quality checked by someone outside of the Primary Care Analytics team but within the Central Reporting and Analytics team for the 2nd lines of defence assurance process.

1.14.
Review your business continuity or contingency plans to include this activity. Have you identified any risks?
No

If yes include in the risk section of this template.

1.15.

What training is planned to support this activity?
n/a

2. Linkage, Data flows, Sharing and Data Opt Out, Sharing Agreements, Reports, NHS Digital

2.1.
Are you proposing to combine any data sets?
No

If yes then provide the details here.
Click here to enter text.

2.2.
What are the Data Flows? (Detail and/or attach a diagram if you have one).
GPs input data into EMIS and Primary Care Analytics team access that information. After the data has been accessed it is exported from EMIS. A PCA team member will then save in a secure area on the SCW Odrive. Data is shared with a colleague in the Central Reporting and Analytics team for data quality checks. Once the report has been produced it will be shared with BOB ICB as an attachment in an email via Outlook.

2.3.
What data/information are you planning to share?
Stats regarding the usage of the dPCP template in GP practices in Oxfordshire

2.4.
Is any of the data subject to the National Data Opt Out?
Yes - it has already been applied

If your organisation has to apply it describe the agreed approach to this
Type 1 objection leads to data being excluded in the source (EMIS).

If a patient does not consent to their data being used, it will not be included in Population Reporting. This is because a type 1 objection, is them opting out of not having their data used at all, beyond their care. So their data would not be included if they opt out.

If another organisation has applied it add their details and identify what data it has been applied to
Click here to enter text.

If you do not know if it applies to any of the data involved then you need to speak to your Data Protection Officer to ensure this is assessed.

2.5.
Who are you planning to share the data/information with?
BOB ICB

2.6.
Why is this data/information being shared?
To provide performance stats

2.7.
How will you share it? (Consider and detail all means of sharing)
NHS Mail

Tick if you are planning to use Microsoft Teams or another similar online networking/meeting solution that may have the facility to store or record conversations or related data as part of the sharing arrangements ☐

Provide details of how you have considered any privacy risks of using one of these solutions
Click here to enter text.

2.8.
What data sharing agreements are or will be in place?

Data sharing agreement currently in place with BOB

2.9.

What reports will be generated from this data/information?

I don't know outside of the report the PCA team will generate. Sensitive data will be removed as part of report production.

2.10.

Are you proposing to use Data that may have come from NHS Digital (e.g. SUS data, HES data etc.)?

No

If yes, are all the right agreements in place?

Choose an item.

Give details of the agreement that you believe covers the use of the NHSD data

Click here to enter text.

If no or don't know then you need to speak to your Data Protection Officer to ensure they are put in place if needed.

3. Data Processor, IG Assurances, Storage, Access, Cloud, Security, Non-UK processing, DPA

3.1

Are you proposing to use a third party, a data processor or a commercial system supplier?

No

The Primary Care Analytics team are the data processor, thus will not be outsourcing the delivery of this request.

If yes use these spaces to add their details including their official name and address. If there is more than one then include all organisations. If you don't know then stop and try and find this information before proceeding.

Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.
Click here to enter text.

3.2

Is each organisation involved registered with the Information Commissioner? Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	Registered	Registration details or comments if not registered
GP Practices in Oxfordshire	Yes	Various
SCW	Yes	Z2950066
BOB ICB	Yes	ZB343068
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.

3.3

What IG assurances have been provided to you and does any contract contain IG clauses that protect you as the Controller? (e.g. in terms and conditions, their contract, their tender submission). Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

IG support needed

Name of organisation	Brief description of assurances obtained
SCW	ISO 27002 and Cyber Essential Plus accreditation. DSP in place between SCW and GP practices
BOB ICB	DSA in place between ICB and SCW
	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.

3.4

What is the status of each organisation's Data Security Protection Toolkit?

DSP Toolkit

IG support needed

Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	ODS Code	Status	Published date
BOB GP Practices	Various	2021-22 Standard Met	Various
SCW	0DF	Standards Exceeded	30/06/2022
BOB ICB as Buckinghamshire CCG	14Y	Standards Exceeded	24/06/2022
BOB ICB as Oxfordshire CCG	10Q	Standards Exceeded	24/06/2022
BOB ICB as Berkshire West CCG	15A	Standards Exceeded	23/06/2022
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.

3.5

How and where will the data/information be stored? (Consider your answer to 2.7 and the potential storage of data in any online meeting or networking solution).

Circulated internally at BOB ICB to staff working on commissioning decisions, storage in line with BOB policies.

3.6

How is the data/information accessed and how will this be controlled?

The PCA team will provide access to the report as an attachment in an NHS mail.

3.7

Is there any use of Cloud technology?

No

If yes add the details here.

Click here to enter text.

3.8

What security measures will be in place to protect the data/information?

Awareness of IG rules and protocols, mandatory staff training within SCW and BOB

Is a specific System Level Security Policy needed?

No

Data sent to the customer will be aggregate numbers only at practice level.

If yes or don't know then you need to speak to your Data Protection Officer to ensure one is put in place if needed.

3.9

Is any data transferring outside of the UK? (you must determine this so only select don't know if you have further investigations to make but the DPIA will not be approved without this information)

No

If yes describe where and what additional measures are or will be in place to protect the data.

Click here to enter text.

3.10

What Data Processing Agreement is already in place or if none, what agreement will be in place with the organisation and who will be responsible for managing it?

Data Processing Agreement in place with BOB

4. Privacy Notice, Individual Rights, Records Management, Direct Marketing

4.1

Describe any changes you plan or need to make to your Privacy Notice and your proposed completion date? (There is a checklist that can be used to assess the potential changes required or if you wish for it to be reviewed then add the link below).

4.2

How will this activity impact on individual rights under the GDPR? (Consider the right of access, erasure, portability, restriction, profiling, automated decision making).

No impact. Practices to manage individual rights requests in the usual way

4.3

How long is the data/information to be retained?

In line with SCW Records Management Policy & Procedure

4.4

How will the data/information be archived?

PCA to follow SCW Records Management policy and procedures

https://intranet.scwcsu.nhs.uk/resources/information-governance/records-management

4.5

What is the process for the destruction of records?

Source data remains in the GP records. Extracted data should be reviewed at the end of the retention period and file/s securely deleted if no longer required in accordance with SCW Records Management policy & procedures

4.6

What will happen to the data/information if any part of your activity ends?

No impact. Source data remains in the GP records.

4.7

Will you use any data for direct marketing purposes? (you must determine this so only select don't know if you have further investigations to make but the DPIA will not be approved without this information)

No

If yes please detail.

Click here to enter text.

5. Risks and Issues

5.1

What risks and issues have you identified? The DPO can provide advice to help complete this section and consider any measures to mitigate potential risks.

Describe the source of risk and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	**Likelihood of harm**	**Severity of harm**	**Overall risk**
Disclosure of personal sensitive information	Remote	Significant	Low
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

5.2

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in 5.1

Risk	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved (SIRO)**
Disclosure of personal sensitive information	Data processing to remove sensitivities Please see section 1.6 where it is mentioned data within EMIS cannot be processed. The Analyst will remove data that is not required.	Eliminated	Low	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

5.3

What if anything would affect this piece of work?

IG agreement to allow for data extrapolation.

5.4

Please include any additional comments that do not fit elsewhere in the DPIA?

Click here to enter text.

6. Consultation

6.1

Have you consulted with any external organisation about this DPIA?

No

If yes, who and what was the outcome? If no, detail why consultation was not felt necessary.
Click here to enter text.

6.2
Will you need to discuss the DPIA or the processing with the Information Commissioners Office? (You may need the help of your DPO with this)
No

If yes, explain why you have come to this conclusion.
Click here to enter text.

7. Data Protection Officer Comments and Observations

7.1 Comments/observations/specific issues	Signed following confirmation from the SCW CSU Senior Information Governance Consultant that agreements in Oxfordshire support this extraction.

8. Review and Outcome

Based on the information contained in this DPIA along with any supporting documents, you have determined that the outcome is as follows:
A) There are no further actions needed and we can proceed

If you have selected item B), C) or D) then please add comments as to why you made that selection
Click here to enter text.

We believe there are
Choose an item.

If you have selected item B) or C) then list these in the amber boxes below and then consider additional measures you could take and include these in the green boxes below

Residual risks and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	**Likelihood of harm**	**Severity of harm**	**Overall risk**
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

Additional measures you could take to reduce or eliminate residual risks identified as medium or high risk above (B and C)

Risk	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved (SIRO)**
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
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Signed and approved on behalf of Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board

Name: [redacted]

Job Title: Data Protection Officer

Signature: [redacted] Date: 08/11/2022

Signed and approved on behalf of Click here to enter text.

Name: Click here to enter text.

Job Title: Click here to enter text.

Signature: Click here to enter text. Date: Click here to enter a date.

Please note:

You should ensure that your Information Asset Register and Data Flow Mapping Schedules are updated where this is relevant.

This DPIA can be disclosed if requested under the Freedom of Information Act (2000). If there are any exemptions that should be considered to prevent disclosure detail them here:
Click here to enter text.