DPIA REF: 23/24-013

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 :	23/08/2023
Title of the activity/processing:	Insights Portal – Migration of SCW Data Intelligence reports to Microsoft BI/Azure for Anonymised Reports
Who is the person leading this work?	███████ SCW CSU
Who is the Lead Organisation?	BOB ICB
Who has prepared this DPIA?	████████
Who is your Data Protection Officer (DPO)?	█████
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).	The SCW Digital Analytics and Intelligence Team (DA&I) provides a performance data and reports management service to the ICB. The data used comes from central NHS dataflows – i.e., from national submissions by NHS providers, local authorities, and independent organisations to NHSE and associated bodies (Public Health England, NHS Statistics Services, etc.). SCW DA&I collects the data into its data warehouse and makes it available to the ICB via a suite of standardised SCW 'Enterprise' reports and tailored reports created on request through embedded teams. SCW make sure that only data to which the ICB is entitled (through its DARS contracts with NHSE) is provided in this way. The centralised reports are accessed by ICB staff via SCW's Insights Portal. The Insights Portal and the reports are currently stored on servers owned, secured, and managed by SCW. The proposal is to migrate the reports (both historic and future) onto Microsoft's Power BI Service, a cloud-based service provided by Microsoft and hosted within the SCW Azure Tenant. (The data warehouse will remain on premise and therefore not in the cloud). This DPIA is to ensure due diligence is undertaken to ensure organisational and technical measures are in place to support the migration of reports which can contain anonymised, personal and special categories of data. **Note**: This DPIA will be for the purpose of anonymised reports only. Further DPIAs are required to support reports processing personal and special categories of data.
Are there multiple organisations involved? (If yes – you can use this space to name them, and who their key contact for this work is)**.**	BOB ICB, Microsoft UK and SCW CSU
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).	N/A
Detail anything similar that has been undertaken before?	Sussex ICB & HIOW ICB

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)	☐	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:

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

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.

	Tick or leave blank
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).	☐

What contract is being referred to?
SLA Contract between SCW and BOB ICB

	Tick or leave blank
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).	☐

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

	Tick or leave blank
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).	☐

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

	Tick or leave blank
e) IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER	☐

	Tick or leave blank
(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).	
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	**Tick or leave blank**
(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).	☐
What are the legitimate interests you have?	
Click here to enter text.	

Article 9 (2) conditions are as follows:	
a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT	**Tick or leave blank**
(Requirements for consent are the same as those detailed above in section 1.2, a))	☐
b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION	**Tick or leave blank**
(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).	☐
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	**Tick or leave blank**
(Requirements for this are the same as those detailed above in section 1.2, d))	☐
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	**Tick or leave blank**
(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).	☐
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	**Tick or leave blank**
(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).	☐
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 SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE RIGHTS AND FREEDOMS OF THE DATA SUBJECT, IN PARTICULAR PROFESSIONAL SECRECY	**Tick or leave blank**
(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	**Tick or leave blank**

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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).	☐

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
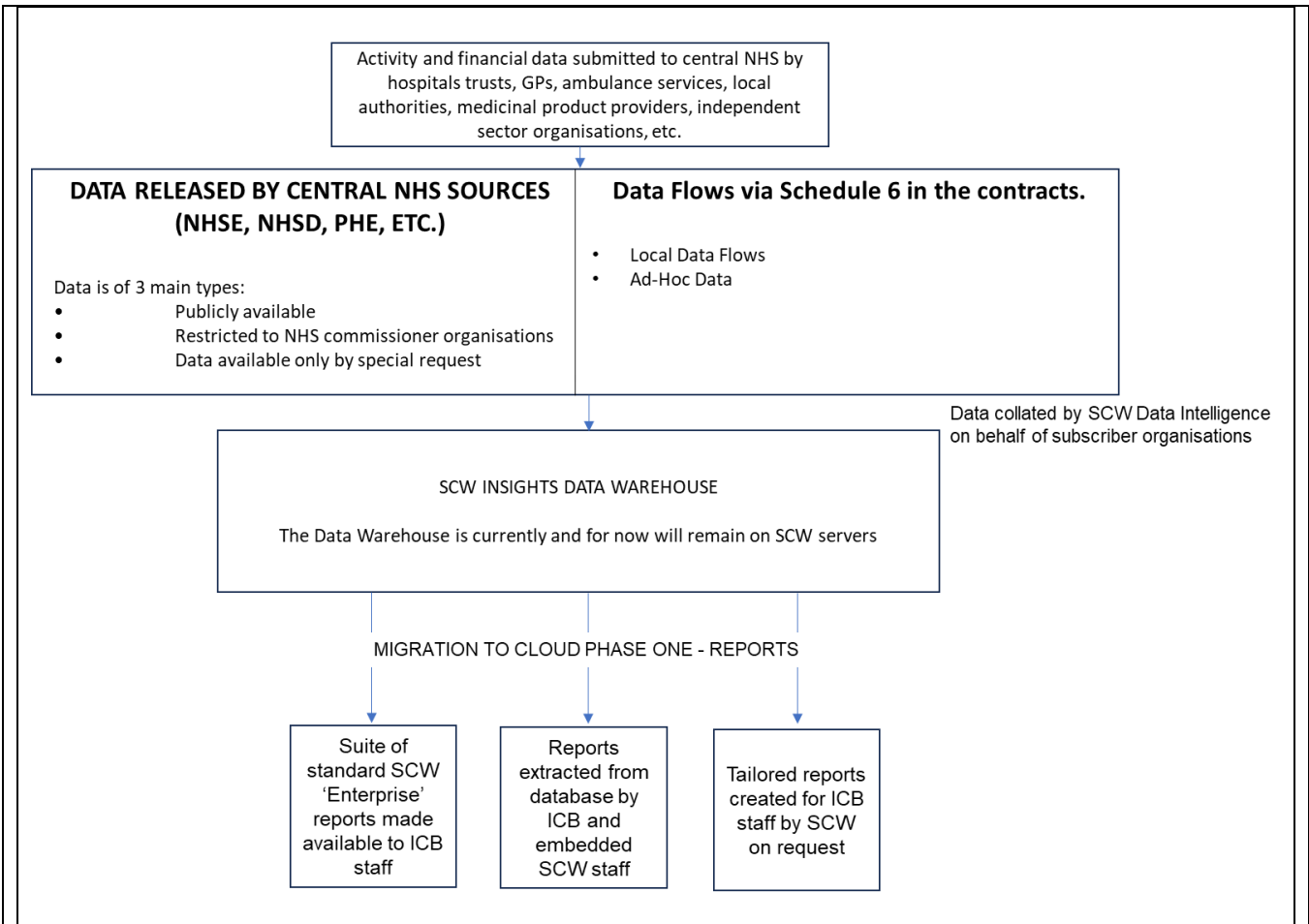
1.4.

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
BOB ICB	Sole Controller
SCW CSU	Processor
Microsoft UK	Processor
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?

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┌─────────────────────────────────────────────────────┐
│ Activity and financial data submitted to central NHS │
│ by hospitals trusts, GPs, ambulance services, local  │
│ authorities, medicinal product providers, independent│
│ sector organisations, etc.                           │
└─────────────────────────────────────────────────────┘
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DATA RELEASED BY CENTRAL NHS SOURCES (NHSE, NHSD, PHE, ETC.)

Data is of 3 main types:
- Publicly available
- Restricted to NHS commissioner organisations
- Data available only by special request

Data Flows via Schedule 6 in the contracts.

- Local Data Flows
- Ad-Hoc Data

Data collated by SCW Data Intelligence on behalf of subscriber organisations

SCW INSIGHTS DATA WAREHOUSE

The Data Warehouse is currently and for now will remain on SCW servers

MIGRATION TO CLOUD PHASE ONE - REPORTS

| Suite of standard SCW 'Enterprise' reports made available to ICB staff | Reports extracted from database by ICB and embedded SCW staff | Tailored reports created for ICB staff by SCW on request |

Data is being processed for the purpose of performance and intelligence. SCW and Microsoft UK are the processors.

1.6.

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

If so, specify what types of information. (e.g. clinical records, occupational health details, payroll information)

Click here to enter text.

1.7.Y

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.

Data presented in dashboard will be anonymised, low number supressed figures only.

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.

Information being used for Performance reporting and intelligence for commissioning decisions.

1.10.

Approximately how many people will be the subject of the processing?

1000 plus

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.

No data collection – all the data will come from the SCW Data Warehouse

1.12.

How will you edit the data?

No editing data – data used for reporting purposes only.

1.13.

How will you quality check the data?

Data quality is the responsibility of the data providers – SCW BI carries out the data quality checks.

1.14.

Review your business continuity or contingency plans to include this activity. Have you identified any risks?

Yes

If yes include in the risk section of this template.

1.15.

What training is planned to support this activity?

None required

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

2.1.

Are you proposing to combine any data sets?

Yes

If yes then provide the details here.

Performance reports are based on data matching from different central NHS sources.

2.2.

What are the Data Flows? (Detail and/or attach a diagram if you have one).

BI analysts will prepare dashboard, access given to ICB to Insights Portal, dashboard shared with Providers. Should a new Local flow be implemented it will have a separate DPIA.

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Flows from NHS Digital (DARS) or existing Local Flows through schedule 6, as per diagram in 1.5. Should a new Local flow be implemented, it will have a separate DPIA.

2.3.

What data/information are you planning to share?

NHS Data Access Request Service (DARS) data and Local Data Flows via Schedule 6 including some patient-level data but not identifiable data.

2.4.

Is any of the data subject to the National Data Opt Out?

No - it is not subject to the national data opt out

If your organisation has to apply it describe the agreed approach to this

Click here to enter text.

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 t

he 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?

NHSE and SCW CSU

2.6.

Why is this data/information being shared?

For performance and intelligence purposes only.

2.7.

How will you share it? (Consider and detail all means of sharing)

Data will be shared with ICB via Insights portal and Microsoft 365 platform.

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 under DARs agreements and Local Data Flows via Schedule 6 in the contracts.

2.9.

What reports will be generated from this data/information?

Reports are produced by SCW on behalf of the ICB.

2.10.

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

Yes

If yes, are all the right agreements in place?

Yes

Give details of the agreement that you believe covers the use of the NHSD data
DARS Agreements
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?
Yes

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.
SCW CSU - Sandford Gate, East Point Business Park, Littlemore, Oxford OX4 6LB
Microsoft UK - MICROSOFT CAMPUS, THAMES VALLEY PARK, BERKSHIRE, READING, RG6 1WG
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
BOB ICB	Yes	ZB343068
SCW CSU	Yes	Z2950066
Microsoft UK	Yes	ZB424023
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)

Name of organisation	Brief description of assurances obtained
SCW CSU	Contract with BOB ICB, DSPT
Microsoft UK	Sub-Contracted by SCW - DSPT
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.	Click here to enter text.

3.4

What is the status of each organisation's Data Security Protection Toolkit?
DSP Toolkit
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 ICB	QU9	Standards Exceeded	27/06/2023

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SCW CSU	0DF	Standards Exceeded	22/06/2023
Microsoft UK	8JH14	Standards Exceeded	15/05/2023
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.	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.

3.5

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).

Stored in SCW CSU on-premises Data Warehouse and Report data stored on Microsoft Cloud software. The reports will be stored on Microsoft Azure servers within the SCW Tenant.

3.6

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

ICB staff require authorisation by managers within the ICB and by the SCW CSU Data Analytics and Intelligence Team to access the Insights suite of reports. This uses the application form below which includes undertakings that access is required for work purposes, access will not be shared with others, and data will always be processed, transferred, and stored securely.

SLA Insights Access
Request Form.docx

SCW DA&I filter access so that staff in the ICB can only see relevant data for the organisation.

3.7

Is there any use of Cloud technology?

Yes

If yes add the details here.

Microsoft 365 software will be used. This includes SharePoint and Power BI within SCW Azure tenant

3.8

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

The reports will be stored on Microsoft Azure servers and protected primarily by Microsoft security measures which include Azure Firewall, default encryption and access controls via Azure Active Directory.

The service is provided to the ICB by SCW CSU who ensure that security standards comply with their Information Security Policy and Network Security Policy. SCW CSU are also Cyber Essentials Plus accredited.

Is a specific System Level Security Policy needed?

No

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?

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Data Processing Agreement in place between BOB ICB and SCW CSU

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).
No changes required.

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

4.3

How long is the data/information to be retained?
8 years

4.4

How will the data/information be archived?

The reports will be archived after 6 years.

4.5

What is the process for the destruction of records?

The reports will be deleted after 8 years following a review in line with the ICB Records Management Policy and NHS Records Management Code of Practice 2021.

4.6

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

Activity could end if IT services are no longer provided by SCW CSU. Loss of IT suppliers/contractors is addressed in the ICB Business Continuity Plan.

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
Risk of re-identification	Remote	Minimal	Low
Unauthorised/accidental access to Insights Portal	Remote	Minimal	Low

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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)
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.
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?

N/A

5.4

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

The risks in section 5.1 are based on the anonymised reports.

6. Consultation

6.1

Have you consulted with any external organisation about this DPIA?

Yes

If yes, who and what was the outcome? If no, detail why consultation was not felt necessary.

Consultation with SCW CSU required to ensure effective controls are in place before migration of reports

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**	The DPIA is for anonymised reports only. Any future reports processing personal data will require a separate DPIA and legal basis.

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.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

Signed and approved on behalf of Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board

Name: ██████████████

Job Title: Data Protection Officer

███████████████

Signature: ████████████   Date: 20/10/2023

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 as a result of this project.

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.