23-24-018

Data Protection Impact Assessment (DPIA) Template

SharePoint Online

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;	□X

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 :	22/09/2023
Title of the activity/processing:	N365 Pillar 2 – SharePoint Online
Who is the person leading this work?	[redacted]
Who is the Lead Organisation?	BOB ICB
Who has prepared this DPIA?	[redacted]
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).	SharePoint Online is to be used as an Information and Document sharing platform for all BOB ICB to cascade information and for GP Practices and PCNs to work collaboratively. Currently practices and PCNs are using Teamnet for this feature. Documents will need to be offloaded from Teamnet and onto SharePoint. Documents will include the following: 1. Clinical Information - publicly available data does not include PID (Patient Identifiable Data). For example, clinical guidelines, e.g., how to treat the condition, such as guidance. 2. Policies and procedures 3. GP Bulletin information news 4. Practice Staff Annual Leave Bookings (First and Second Name Only) 5. CQC Documentation.
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 BOB GP Site – 156 Practices SCW CSU NHS England (NHS Digital) Microsoft Accenture
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).	None
Detail anything similar that has been undertaken before?	NHS England MS Teams (E3 restricted) software deployment

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:	
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	**Tick or leave blank** ✓

Health and Social Care Act (2012) NHS Digital has a legal obligation (a Direction issued by the Secretary of State for Health and Social Care) that requires NHS Digital to establish and operate informatics systems and to exercise systems delivery functions including NHSmail as the national secure email service approved for sharing sensitive information. NHS Digital is appointed as the service provider of N365, taking responsibility for setting up and managing the data processing contract for the service on behalf of all controllers. Health and Social Care Act (2012) – Section 254, Direction: "Novation of Information and Technology Contracts from DH to NHS Digital: "Electronic Prescription Service, Health and Social Care Network, N3, NHS Choices, NHS e-Referral Service, Secondary Uses Service (SUS), Spine (Named Programmes) Directions 2016" (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?	
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? Click here to enter text.	

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 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).	**Tick or leave blank** □
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 j). 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
Microsoft	Processor
BOB GP practices total - 156	Sole Controller
BOB ICB	Sole Controller
Accenture	Processor
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?

This platform is being used by practices to work collaboratively. Practices will be migrating data off Teamnet (which was their original platform) and onto SharePoint. Documents will include the below:

1. Clinical data - publicly available data does not include PID (Patient Identifiable Data). For example, clinical guidelines. For example, clinical guidelines, i.e. how to treat the condition, such as guidance.
2. Policies and procedures
3. GP Bulletin - information and news for practices from BOB ICB
4. Practice Staff Annual Leave (First Name and Second name only)
5. CQC documents

SharePoint Online is to be used as an Information and Document sharing platform for all BOB ICB to cascade information and for GP Practices and PCNs to work collaboratively.

Currently practices and PCNs are using Teamnet for this feature. Documents will need to be offloaded from Teamnet and onto SharePoint.

Documents will include the following:
1.Clinical Information - publicly available data does not include PID (Patient Identifiable Data). For example, clinical guidelines, e.g., how to treat the condition, such as guidance.
2.Policies and procedures
3.GP Bulletin information news
4.Practice Staff Annual Leave Bookings
5.CQC Documentation.

There will be a range of SharePoint sites, each for their own cohort of users such as:
1.BOB ICB site
2.PCNs
3.Site for each GP practice.
Each practice and PCN will have links to access the BOB ICB site and each PCN with all its member GP Sites will have an interconnecting link.

Templates are to be designed to keep consistency in features and access across all sites.

Provisioning sites, collections and developing the platform, store to store documents is controlled and managed by Local Administrators. Local End-User Policy enforcement configuration between Public and Private and these will be managed by local administrators within the organisation to restrict user access platforms.

Prior to any migration SCW will be required to support Information Asset Owners (IAO's) and Information Asset Administrators (IAAs) and their teams in ensuring the correct permissions are set up per SharePoint site where their documents will be migrated to and this will be facilitated by the SCW Programme Team. This will be completed using an approved document classification model as defined by Information Governance and Records Management. This will need to be applied to the Role based Access on the SharePoint permissions. Each role will be able to control who has Read/Write access.

Power Platform is a term used to describe Microsoft's collection of products: Power Automate is the one we will be using for our SharePoint sites.

Power Automate, previously known as Microsoft Flow is a cloud-based solution that allows users to automate tasks and workflows between applications and services to get notifications, sync files and gather data.

Users can experience universal workflows across applications due to the integration capabilities. Users can also create user defined workflows and robotic process automation with UI flows (an element that groups Screens and Blocks in an app).

There are four Power Automate licenses and will be held by the ICB and SCW. The license holder requests access to a SharePoint site, runs the Power Automate and then the user is removed by the Site.

Microsoft data centres in UK will be hosting SharePoint platform. The Data Controllers and Data Processors in section 1.4 above will be processing the data.

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)

GP Practice staff personal data

1.7.

How are you satisfying the common law duty of confidentiality?

Reasonable expectations

If you have selected an option which asks for further information please enter it here

A system to record staff annual leave is expected to be provided by the employing organisation.

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 will be stored on encrypted Microsoft N365 platforms.

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

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.

The data will include some aspect of local NHS business workflows and operations where there is a need to conduct cross working communication and collaboration. Usage examples will include flu campaign info shared with other practices. Staff personal data: Each sharepoint site will only be visible and used by each specific GP Practice, staff personal data will not be available to any other site.

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.)

Electronic form

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.

Click here to enter text.

1.12.

How will you edit the data?

Data stored on this platform can be edited by using online tools based on Role-based access control (RBAC) model with correct access permissions assigned. Each user will be given specific access controls, i.e. Site Owners (Full access to Add, Edit, Delete), Site Members (Limited access to make amendments to only pages they have access to) and Site Visitors (Read-Only access throughout site) .

Users can edit data based on the access given.

1.13.

How will you quality check the data?
Team owners/data owners/site owners but also as part of internal and external auditing capability offered by N365 platform.

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

Microsoft provides a 99.95% uptime using UK Regions and Zones
If yes include in the risk section of this template.

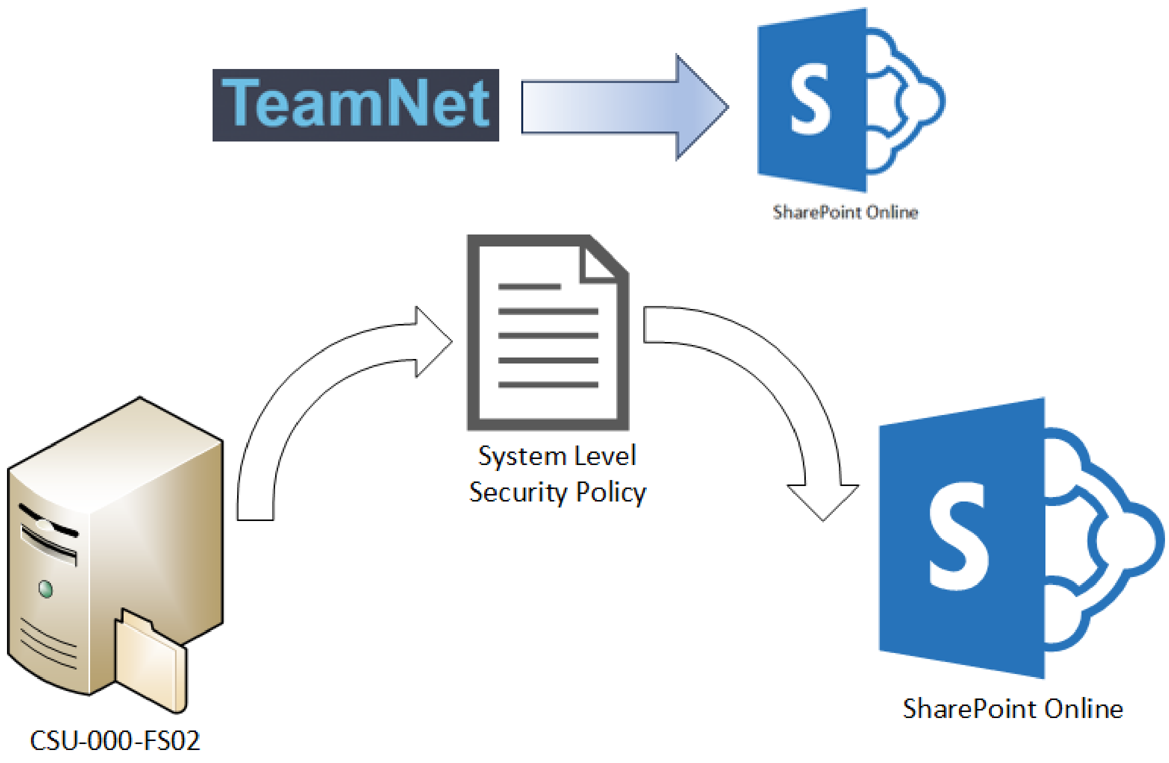
1.15.
What training is planned to support this activity?
The SCW Training team have a schedule of training for N365, for example video's, lunch and learn sessions, training materials and virtual training sessions.

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

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). Moving data from Teamnet to SharePoint – nothing will change. What Teamnet was about and how if this might change moving to SharePoint



2.3.
What data/information are you planning to share? Give examples

1. Clinical information - publicly available data does not include PID (Patient Identifiable Data). For example, clinical guidelines. For example, clinical guidelines, i.e., how to treat the condition, such as guidance.
2. Policies and procedures
3. GP Bulletin - information and news for practices from BOB ICB
4. Practice Staff Annual Leave (First and Second Name Only) – will not be shared outside of own Practice.
5. CQC documentation

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 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 to cascade communications with GP Practices and PCNs. Practices and PCNs to share and cascade information amongst themselves to support collaborative working. GP Staff personal data will not be shared outside of own practice.

2.6.

Why is this data/information being shared?

To conduct cross working communication and collaboration.

2.7.

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

Relevant access permissions – each group will have access to their own pages. Through a link being sent to Pages being shared

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?

N/A

2.9.

What reports will be generated from this data/information?

No reports will be generated

2.10.

Are you proposing to use Data that may have come from NHS England (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 NHSE 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?
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.

Microsoft Limited
Microsoft Campus
Thames Valley Park
Reading
Berkshire
RG6 1WG

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
Microsoft Limited	Yes	Z6296785
SCW CSU	Yes	Z2950066
Accenture	Yes	Z8031318
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)

Microsoft practises privacy by design and privacy by default in its engineering and business functions. As part of these efforts, Microsoft performs comprehensive privacy reviews on data processing operations that have the potential to cause impacts to the rights and freedoms of data subjects.

Privacy teams embedded in the service groups review the design and implementation of services to ensure that personal data is processed in a respectful manner in accordance with international law, user expectations and express commitments.

National contract in place with NHSE

Name of organisation	Brief description of assurances obtained
Microsoft Limited	**Microsoft and the UK GDPR** The UK GDPR requires controllers (such as organizations using Microsoft's enterprise online services) only use processors (such as Microsoft) that provide sufficient guarantees to meet key requirements of the UK GDPR. Microsoft has taken the proactive step of providing these commitments to all Volume Licensing customers as part of their agreements. **ISO/IEC 27018 Code of Practice for Protecting Personal Data in the Cloud** **https://learn.microsoft.com/en-us/compliance/regulatory/offering-ISO-27018?view=o365-worldwide** UK governments digital market Cloud 13 Framework compliance.
SCW CSU	IT provider, contract
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
MICROSOFT UK	8JH14	22/23 Standards Exceeded	16/05/2023
SCW CSU	0DF	22/23 Standards Exceeded	22/06/2023
Accenture	LSP01	22/23 Standards Exceeded	29/06/2023
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.

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).

The documents in SharePoint will be stored in Microsoft's UK South Data centres

3.6

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

Role based access control, this is controlled by security groups and to have access permission can be requested via a service desk request. Guest or visitor access can be granted for collaboration purposes. Underlying processes to support this activity are in development and will be introduced by the programme to the service desk as part of service transition.

3.7

Is there any use of Cloud technology?

Yes

If yes add the details here.

SharePoint Online is Cloud based as part of the N365 platform in Microsoft's UK South Data centre. Microsoft is part of the government official Digital Marketplace and have both G-Cloud 12 and more recent versions of G-Cloud i.e., 13

3.8

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

Security within SharePoint Online will be a joint responsibility between SCW, SharePoint and GP Sites.
GP Sites are responsible for ensuring the data their users exchange has appropriate legal and governance controls and settings are configured and in place. Data controllers will control access level for end users, i.e., Site Owners, Site Members and Site Visitors

Within N365, data is encrypted at rest and in transit, using several strong encryption protocols, and technologies that include Transport Layer Security/Secure Sockets Layer (TLS/SSL), Internet Protocol Security (IPSec), and Advanced Encryption Standard (AES).

Accenture are the overall administrators and are fully compliant with the ISO20000-1:2011 Service Management system (SMS) standard and are annually re-accredited to confirm continued compliance by an independent business standards organisation (BSI).

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?

Microsoft N365 National contract is managed by NHSE. SCW has got N365 participation agreement with NHSE.

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).

None

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).

There is no impact on rights of data subjects. Data Controllers will manage in line with their own policies and procedures.

4.3

How long is the data/information to be retained?

Data controllers will manage in line with their own policies and procedures in in accordance with the Records Management Code of Practice 2021.

4.4

How will the data/information be archived?

Not applicable

4.5

What is the process for the destruction of records?

When the retention settings are to retain and delete: once data is deleted it remains in Recycle Bin, once the Recycle Bin is emptied the data is permanently deleted in accordance to the NHS guidelines

4.6

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

As part of NHSE shared tenant N365 participation agreement, SCW will receive the data from Microsoft and also receive confirmation that Microsoft have securely destroyed the data.

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**
If someone leaves a practice and they are not removed from the SharePoint site there is a risk they will still have access to the site	Possible	Minimal	Low
If SharePoint access has been accessed via a portable device (Mobile Phone/Tablet) and have Write Access, there is a risk if they lose the device, access can be gained. There may also be a risk of non-authorised party to edit or remove data.	Possible	Significant	Medium
Lack of User Awareness and Training	Possible	Significant	Medium
Compliance with Records Management policy	Possible	Minimal	Low

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)**
If someone leaves a practice and they are not removed from the SharePoint site there is a risk they will still have access to the site.	Practice manager to remove access to staff that leave practice	Eliminated	Low	
If SharePoint access has been accessed via a portable device (Mobile Phone/Tablet) and have Write Access, there is a risk if they lose the device, access can be gained. There may also be a risk of non-authorised party to edit or remove data.	Ensure portal devices have multi-factor authentication, to prevent unauthorised access	Reduced	Low	
Lack of User Awareness and Training	SCW provide training and awareness sessions	Reduced	Low	Choose an item.
Compliance with Records Management Policy	Data Controllers should make all policies available and accessible to all staff	Reduced	Low	Choose an item.

5.3

What if anything would affect this piece of work?

Any decision to cease N365 shared tenant and move to SCW own tenant.

5.4

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

N/A

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	Click here to enter text.

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: [redacted]

Job Title: Governance Manager and Data Protection Officer

Signature: [redacted] Date: 14/02/2024

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.