

Public Service

 **ombudsman**

Data Protection Impact Assessment Procedure

V1.1 May 2025

1 Purpose

- 1.1 We conduct data protection impact assessments to find out if the change we are making, the system we are implementing, the contract we are entering into or the information we are publishing could cause harm to anyone's privacy rights.
- 1.2 Data protection impact assessments are a tool to constructively challenge whether we are making the best use of information, and if we do, are we doing so with considerably, lawfully and with appropriate safeguards in place.
- 1.3 This is good for the people whose information we manage as it reduces the risk of harm or distress through their privacy being invaded. This is also good for us as it reduces the amount of information we need to store and safeguard and makes it more likely we can find what we are looking for.

2 Policy Scope

- 2.1 Article 35(1) of the UK General Data Protection Regulation (UK GDPR) states that you must do a DPIA where a type of processing is likely to result in a high risk to the rights and freedoms of individuals:

“Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data. A single assessment may address a set of similar processing operations that present similar high risks.”

- 2.2 If you are not planning to use personal information i.e. you are procuring ICT hardware like a monitor, or furniture, you do not need to complete a DPIA. We have a screening tool built into the DPIA which asks some basic questions. If you have been able to answer 'no' to the screening questions you will not need to complete the rest of the DPIA.
- 2.3 Personal information is information about or relating to people. Please find below some examples of when a DPIA will or will not be required.

Table showing examples of when a DPIA is or is not required

Activity	DPIA required?	Comments
Upgrade corporate mobile phones	No	Low risk of harm to the rights and freedoms of individuals – changing the handset is about the device, not how it is used
Monitor location of corporate mobiles	Yes	High risk of harm to the rights and freedoms of individuals through location tracking of staff
Requiring all complainants to provide detailed demographic data	Yes	High risk of harm to the rights and freedoms of individuals as will include special category (very sensitive data like genetics, race, religion, or medical records) are being handled at scale
Ask successful job applicants to provide their national insurance number	No	Low risk of harm to the rights and freedoms of individuals – this is necessary to pay them.
Asking all candidates to provide their National Insurance number	Yes	High risk of harm to the rights and freedoms of individuals as collecting this unnecessarily exposes those people to the risk of misuse.

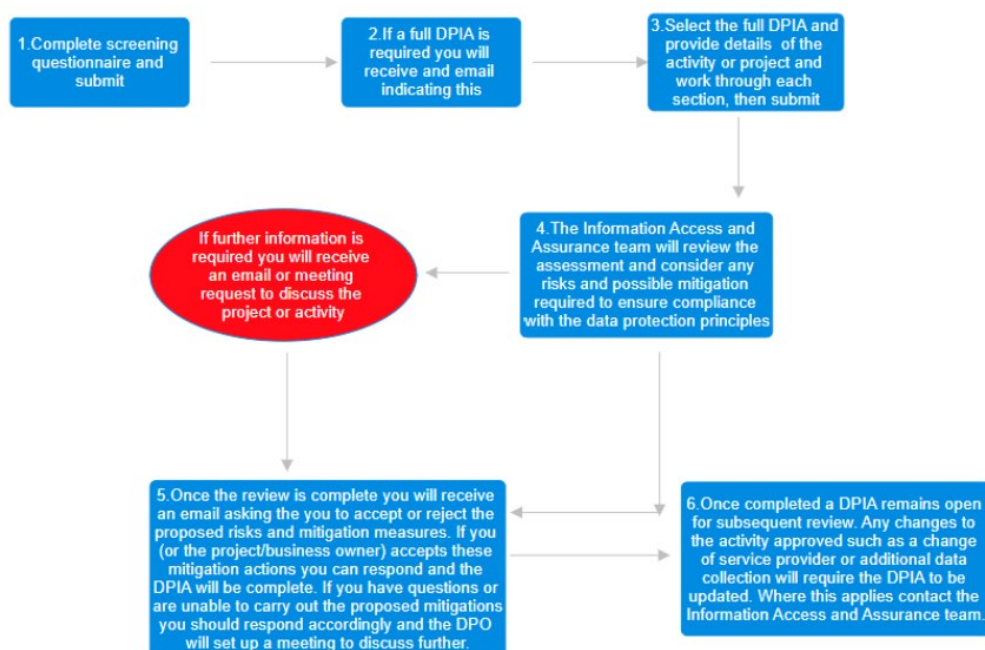
3 Principles

- 3.1 Data Protection laws (GDPR) require “privacy by design” to be at the heart of all activities which involve information about or that identifies people. We can demonstrate our compliance with this requirement by conducting Data Protection Impact Assessments (DPIA).
- 3.2 This is a formal approach to help us to properly identify and assess the risks to people from the way their personal data is collected, processed, shared, stored and disposed of. This is better for us and the people whose information we handle as through reducing risk we make it easier to find the information we are looking for, reduce the cost of both paper and digital storage and protect ourselves against inadvertent mishandling.

- 3.3 Screening questions included in the DPIA - if you can answer yes to any of these then you will need to complete a DPIA
- 3.4 Will personal data be used for evaluation or scoring? For example - to evaluate a data subjects performance at work, economic situation, health, interests or behaviour & movements.
- 3.5 Will personal data be used for automated-decision making?
- 3.6 Will personal data be used for systematic monitoring?
- 3.7 Will sensitive data or data of a highly personal nature be used (Including Special Category data)?
- 3.8 Will personal data be processed on a large scale? For example, will the project involve the processing of a large volume of data subjects personal data over an extended period of time.
- 3.9 Will personal data be used for matching or combining datasets?
- 3.10 Will personal data concerning vulnerable data subjects be used?
- 3.11 Will this project involve the use of Innovative or new technological/ organisational solutions?
- 3.12 Could the processing of personal data in this project prevent data subjects from exercising a right or using a service or a contract?

4 Data Protection Impact Assessment Process

4.1



4.2 The DPIA is accessible from within HelpHub – Information Access and Assurance

- Related policies and guidance:
- Security and Incident Management Policy
 - Security Policy
 - Privacy Notices
 - Service Model Guidance

Version control

Date	Version	Amends	Owner of amends	Agreed by
May 2022	1.0	Drafted	Angharad Jackson	Gill Kilpatrick
May 2025	1.1	Minor amendments due to process change	Alex Daybank	