

Neen Savage Parish Council

Data Protection Impact Assessment

Under GDPR a Data Protection Impact Assessments (DPIAs) must be carried out where processing personal data poses a high risk to the rights and freedoms of individuals. This applies may apply to existing systems or processes where these are upgraded or substantially overhauled.

Where two or more of the following apply, the Council will carry out a DPIA when it is proposing to introduced a new system.

1. Profiling is in use. Example: you monitor website clicks or behaviour and record people's interests.
2. Automated-decision making. Example: when processing leads to the potential exclusion of individuals.
3. CCTV surveillance of public areas. Processing used to observe, monitor or control data subjects.
4. Sensitive personal data as well as personal data relating to criminal convictions or offences.
5. Large scale data processing. There is no definition of "large scale". However consider: the number of data subjects concerned, the volume of data and/or the range of different data items being processed.
6. Linked databases - in other words, data aggregation. Example: two datasets merged together, which could "exceed the reasonable expectations of the user" e.g. you merge your mailing list with another council, club or association.
7. Data concerning vulnerable data subjects, especially when power imbalances arise, e.g. staff-employer, where consent may be vague, data of children, mentally ill, asylum seekers, elderly, patients.
8. "New technologies are in use". E.g. use of social media, etc.
9. Data transfers outside of the EEA.
10. "Unavoidable and unexpected processing". For example, processing performed on a public area that people passing by cannot avoid. Example: Wi-Fi tracking.

DPIA required? YES/NO

If Yes the Clerk will complete the following Assessment:

Neen Savage Parish Council

Project Objective	
Effect on service/operations	
Who is affected by Project?	
New type of data on individuals?	
Large Scale Processing?	
Risks if combining data?	
Will it force personal data to be given?	
Will data be shared with new organisations?	
Will data be transferred outside of the EEA	
Will data be used for a different purpose?	
Will data be collected about children or vulnerable persons?	
Will new technology be used, that is likely to be intrusive?	
Will monitoring or tracking be involved?	
Is data used for automated decision making?	
Is data used for evaluation or scoring?	
Is sensitive data being collected?	
Will it prevent people from exercising a right or use a service?	

Neen Savage Parish Council

Is the data likely to be viewed as private or confidential?	
Will contact be required likely to be viewed as intrusive?	

Other issues to consider

Lawful grounds for Project and purpose	
How will people be informed and will consent be required?	
Who is data disclosed to and how will data be hosted?	
Who needs to be consulted including the ICO?	
Risk Assessments?	
Data minimisation	
Accuracy and time limited	
Storage of data and deletion	
Appropriate data security measures, encryption ?	
Can data subjects exercise their rights?	
Training required?	
Technical and organisation measures to reduce risk and recognise unusual activity?	

Completed and recorded by the Clerk on

Notified to Council on.....

Notified to ICO (if required).....