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| **Document Title** | **PIA (Privacy Impact Assessment) form** |
| Version | 06/11/19 |
| Author | Information Compliance Manager, VCO |
| Owning Department | Vice-Chancellor’s Office |
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| Approving Body | Information Assurance and Security Committee |
| Relevant to | All academic and professional services staff |

Refer to the [Guidance on conducting a Privacy Impact Assessment](https://docs.gre.ac.uk/rep/vco/privacy-impact-assessment-template) (PIA) for information about Privacy and how to complete this Privacy Impact Assessment form.

**Document Structure:**

* **Step One – Identify the need for a PIA**. If a PIA is not needed, the following steps need not be done.
* **Step Two – Describe information flows or procedures for the project**
* **Step Three** – **Identify the privacy risks**
* **Step Four – Find solutions to the identified risks**
* **Step Five – Approval and record-keeping**

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| **Step One – Identify the need for a PIA** |

Answer these screening questions to ascertain the need for a PIA.

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|  |  | **Yes** | **No** |
| 1.1 | Does the project / system / process involve the collection or processing of information about individuals? |  |  |
| 1.2 | Does the project / system / process compel individuals to provide information about themselves? |  |  |
| 1.3 | Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? |  |  |
| 1.4 | Will the information about individuals be used for a purpose it is not currently used for, or in a way it is not currently used? |  |  |
| 1.5 | Would the individuals concerned have a reasonable expectation that the information about them wouldn’t be used in this way? I.e. it would be an unexpected use. |  |  |
| 1.6 | Does the project / system / process involve technology which might be perceived as being privacy intrusive?  |  |  |
| 1.7 | Will the project / system / process result in decisions or action being taken against individuals in ways which can have a significant impact on them? |  |  |
| 1.8 | Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, is it sensitive personal information, or information that people would consider to be particularly private? |  |  |
| 1.9 | Individuals will not be able to opt out of the system. If this statement is true tick Yes. |  |  |
| 1.10 | Will the project require individuals to be contacted in ways which they may find intrusive? |  |  |
| 1.11 | The impact on privacy may be disproportionate to the outcomes which will be achieved by the project. Is this the case?  |  |  |

If the answer to any of these questions is yes, then continue completing the PIA.

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| **General information**  |
|  |   | **Description** |
| a | Name of project |  |
| b | Project lead/sponsor  |  |
| c | Owning department  |  |
| d | Proposed implementation date |  |
| e | Is this a retrospective PIA? | Yes / No |

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| **Step Two - Information flows or procedures** |
| 2.1 | What are the aims of the project / the purposes for collecting or processing the data? It is important to identify all of the purposes for which the information might be used in the future. |
| 2.2 | How will the data / information be obtained? Where is the information coming from? For instance, is it coming from the Data Subject, a third party or somewhere else e.g. a University of Greenwich system? Please describe. |
| 2.3 | If a third party is involved in any way, including by use of an external system or software, is a contract / data sharing agreement in place with the third party? If yes, please provide a copy of the contract, or explain why not. The University has a [Data Sharing Protocol or Data Processor Agreement template](https://www.gre.ac.uk/about-us/governance/information-compliance/privacy/data-transfers-and-data-sharing-protocol) which you can complete and use as appropriate. | **Yes** | **No** | **N/a** |
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| 2.4 | Who is / are the Data Subject(s)? E.g. Student, Staff, Student Applicant, etc. |
| 2.5 | What personal data is being processed? E.g. Name, postal address, email address, Banner ID, image, opinions etc. Please specify all elements. |
| 2.6 | Is personal data about children (under 18) being collected? If so please provide age range and details of how consent will be sought. | **Yes** | **No** |
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| 2.7 | How many individuals / Data Subjects’ personal data are being processed? This can be an approximation. |
| 2.8 | What will be the retention period for the data? Please give reasons for this period, and if necessary have this information added to the [Retention Schedule](https://www.gre.ac.uk/about-us/governance/information-compliance/keeping-and-processing-information/information-and-records-retention-schedules) for your area. |
| 2.9 | If software or an IT product is being used, can data be amended / deleted / archived if necessary? Please provide details. | **Yes** | **No** |
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| 2.10 | If software or an IT product is being used, complete the Information Security Assessment Checklist, and indicate here that you have done so. Refer to the [Guidance on conducting a Privacy Impact Assessment (PIA)](https://docs.gre.ac.uk/rep/vco/privacy-impact-assessment-template), point 5, for more information and a link to the Checklist. |
| 2.11 | How will transfers of data to other people or bodies be managed? Give a description of security measures and method of transfer. |
| 2.12 | In which country or countries will the data be held or processed? (Think about where suppliers may process or hold the data, or if the data will be placed online or in the cloud.) |
| 2.13 | Is marketing involved? If yes, how will this process be managed? Indicate how you will get clear affirmative opt in. | **Yes** | **No** |
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| 2.14 | How will individuals be told about the use of their personal data? Include a copy of the Privacy Notice / Data Protection statement to be used. Refer to the [Guidance on conducting a Privacy Impact Assessment (PIA)](https://docs.gre.ac.uk/rep/vco/privacy-impact-assessment-template), point 4, Step Two, for a template Privacy Notice if needed. |
| 2.15 | Will the project require Automated Decision Making Processing (computerised processing of personal data without any human intervention) or Profiling (data about individuals may be analysed so that they may be targeted in some way)? If so provide details. | **Yes** | **No** |
|  |  |
| 2.16 | Is consent to be the lawful basis relied upon for processing the data? If yes, how will this be obtained? If consent is withheld, what would be the consequences? | **Yes** | **No** |
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| **Step Three – Privacy risks** |
| Describe what are the risks to individuals and the University. The more intrusion into a person’s privacy there is - the higher is the risk of impact, or risk of harm. Refer to the [Guidance on conducting a Privacy Impact Assessment (PIA)](https://docs.gre.ac.uk/rep/vco/privacy-impact-assessment-template), point 4, Step Three, for more information. |
|  | **Description of risk** | **Assessment of likelihood / impact of risk – Low/Medium/High** |
| Risk 1 |  |  |
| Risk 2 |  |  |
| Risk 3 |  |  |
| Risk 4 |  |  |
| Risk 5 |  |  |

etc.

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| **Step Four – Solutions to the identified risks** |

Refer to the risks you identified above and describe what are your solutions to reduce, mitigate or eliminate the risks you have specified. Refer to the [Guidance on conducting a Privacy Impact Assessment (PIA)](https://docs.gre.ac.uk/rep/vco/privacy-impact-assessment-template), point 4, Step Four, for some suggestions.

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|  | **Solution / partial solution to risk** |
| Risk 1 |  |
| Risk 2 |  |
| Risk 3 |  |
| Risk 4 |  |
| Risk 5 |  |

etc.

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| **Step Five – Approval and record-keeping** |

Send the completed PIA and associated attachments to compliance@gre.ac.uk.

Compliance will endeavour to get back to you with first comments within 10 working days.

Please note that the PIA is not approved until satisfactory answers to all questions put by Compliance have been answered. If answers are not provided, the PIA will be sent to the Information Assurance and Security Committee (IASC) for a decision as to whether the system or project will be disallowed. You will be notified of this.

Keep a record that you have submitted a PIA, a copy of the PIA, and the date and evidence that you have received approval.