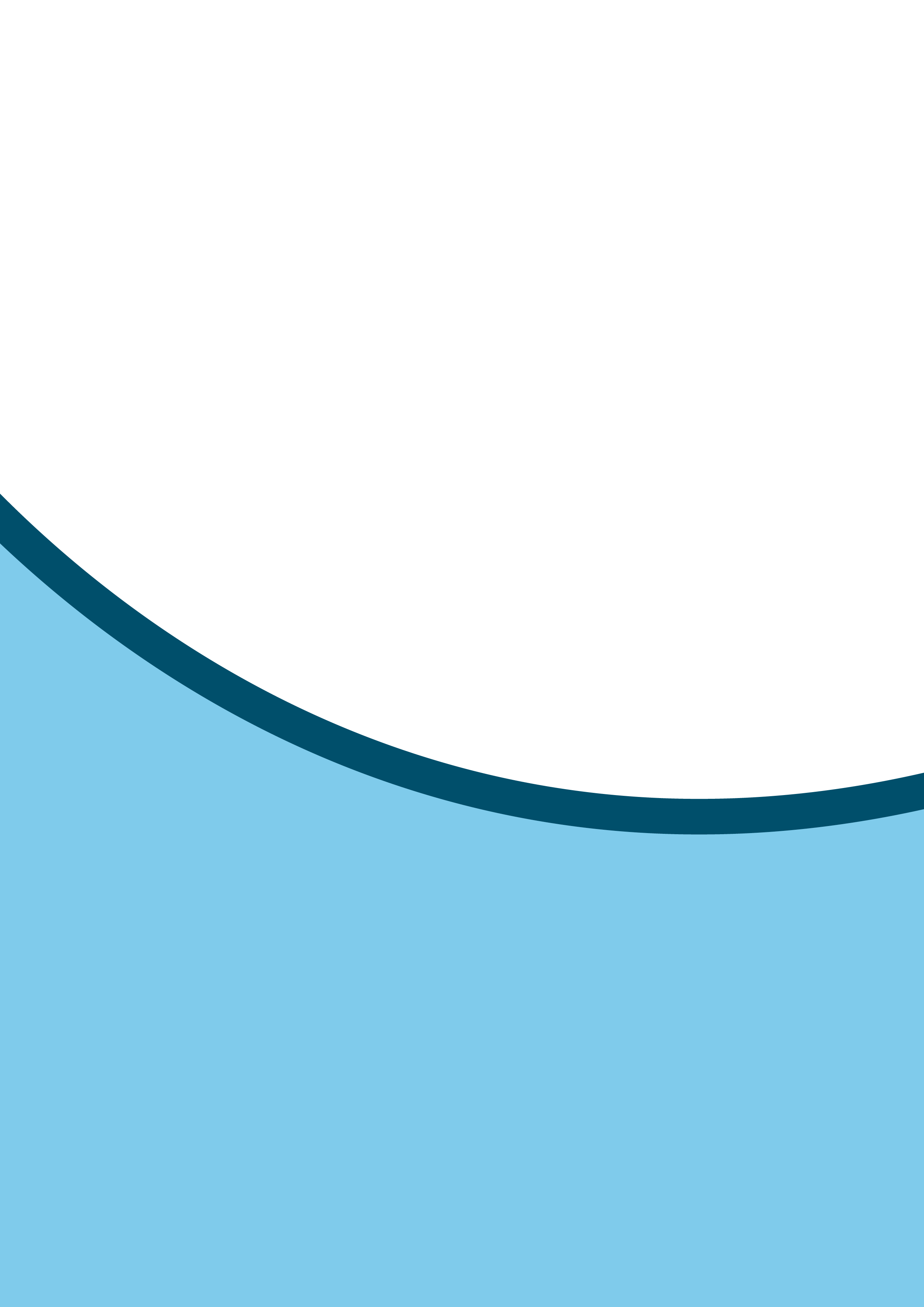
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| Data processing impact assessmen template  June 2022 | |
| Healthwatch-logo_RGB.png |



About this template

We have created this template for you to document that you have considered the data protection issues for relevant projects. It consists of:

* An example Data Processing Impact Assessment (DPIA) for a new survey tool, and
* A blank DPIA template for you to use.

If you need any help completing a DPIA, please contact your Regional Manager.

DPIA example

|  |  |
| --- | --- |
| **Project details** | |
| **Project title** | Introduction of “SwiftSurvey” |
| **Organisation** | Healthwatch Anytown |
| **The proposed go-live date for system or business change is** | 1 October 2022 |
| **Completed by** | Joe Bloggs, Engagement and Communications Officer |
| **Healthwatch Manager/Chief Officer (accountable officer)** | Joanna Bloggs, Healthwatch Anytown Chief Officer |

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| **To assess the need for a Data Processing Agreement, please answer the following questions.** | |
| Are you collecting any new personal or special category data from people? | No |
| Are you introducing a new database, survey tool or online feedback centre? | Yes |
| Are you introducing a new data analysis tool? | No |
| Are you working with a new partner to collect data for the first time? E.g. other Healthwatch in an ICS area | No |
| Are you planning a different approach to collecting and/or storing feedback from the public, e.g. online? | No |
| Would a personal data breach jeopardise the physical health or safety of individuals? | Yes |

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| **If you have answered yes to any of the above questions, describe your proposed change and its purpose.** |
| We want to purchase three licences for SwiftSurvey to collect, store and analyse submitted data about people’s experiences of health and social care. SwiftSurvey is an online tool designed for business users' needs to publish surveys, forms, quizzes etc., for data collection from targeted – or untargeted – users.  Our legal duties include obtaining “the views of local people about their needs for, and their experiences of, local care services”. Before the pandemic, we relied more on paper surveys and face to face engagement to fulfil our statutory duty.  We used the free version of Google Forms to run online surveys during the pandemic but found that its functionality was too limited for our needs. We now need something that has greater functionality, including the capacity to collect more responses. |

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| **Please describe the lawful basis for processing personal data and (where relevant) the lawful basis for processing special category personal data.** |
| Our lawful basis for processing statutory data is public task due to our statutory duty mentioned above.  We will always collect data about health and ethnicity, and depending on the topic of our project, we may also collect sexual orientation and religion. Our lawful basis for collecting this is – necessary for the management of health or social care systems based on UK law. |

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| **Please describe what personal data will be used and/or affected, where you'll obtain this personal data and whether and to whom you'll disclose any personal data.** | |
| What personal data will be used and/or affected? | It will depend on the project but might include IP address, postcode and personal contact details. Whilst every attempt is made to make sure the data is anonymised when published due to the nature of the information, collected personally identifiable data could be present as it can include medical conditions. |
| Where will the personal data come from? | Users of health and social care services  Carers  Health and social care staff |
| Where will the personal data be stored/processed? | Data collected via SwiftSurvey will be stored in the cloud. SwiftSurvey’s servers are based in the UK. We will download it into a .csv file to analyse in Microsoft Excel. We will store the data in a restricted access part of our network. |
| Where will it be sent to/how will the information be used? | Used for analysis to draw conclusions about health and social care experiences (i.e. reports), in line with our statutory duty. Reports will not contain any personal identifiable data. |
| Will it result in any external organisation processing the data? | Yes – SwiftSurvey have access to the platform to help with support needs but will not use any of the data stored. The contract they have asked us to sign stipulates data confidentiality and what they will/will not do with the data. They are an approved Government supplier. |

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| **Please list all identified privacy risks and the mitigation you are putting in place to minimise or resolve them.** | |
| **Privacy risk** | **Privacy solution** |
| Staff understanding of data protection duties | All staff using the tool and analysing the data to go on data protection training and read the guidance provided by Healthwatch England |
| Security breach | Two-factor authentication is enabled to access the survey tool  minimum password strength  Processes for monitoring user accounts and removing access when people leave are in place |
| Processing data fairly | Attending training on data protection and survey design  We have documented our lawful bases for processing data in our privacy notice  We will include an explanation in the survey introduction about how we are going to use their data and our lawful bases for processing personal and special category data |
| Steps taken to ensure that the data is limited to what is necessary for the purpose | Survey question sign off by Chief Officer  Attending training and reading guidance provided by Healthwatch England on survey design and analysis |
| Is there a way for individuals to request access to their data? | We have included details of how people can do so in our privacy notice, and this is up to date. |

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| **Explain why you consider it necessary and proportionate to proceed with the proposal.** |
| We need to have an online survey platform whose servers are based in the UK. The servers of our current survey platform (the free version of Google Forms) are based in the US. We have done due diligence on the product and the supplier and are satisfied that it meets our needs and data protection law requirements. |

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| **Recommendation of your Data Protection Officer** | |
| I have asked Joe Bloggs to include further details on how we'll process data fairly in the risks and mitigations section. With this in place, I recommend using SwiftSurvey to collect data from the public. | |
| Name of Data Protection Officer and date completed | A N Other, Data Protection Officer for Healthwatch Anytown  16/03/2022 |
| **Sign off** | |
| Accountable officer: Joanne Bloggs  Approved: Yes  Date: 17/03/2022 | |

DPIA template

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| **Project details** | |
| **Project title** |  |
| **Organisation** |  |
| **The proposed go-live date for system or business change is** |  |
| **Completed by** |  |
| **Healthwatch Manager/Chief Officer (accountable officer)** |  |

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| **To assess the need for a Data Processing Agreement, please answer the following questions.** | |
| Are you collecting any new personal or special category data from people? |  |
| Are you introducing a new database, survey tool or online feedback centre? |  |
| Are you introducing a new data analysis tool? |  |
| Are you working with a new partner to collect data for the first time? E.g. other Healthwatch in an ICS area |  |
| Are you planning a different approach to collecting and/or storing feedback from the public, e.g. online? |  |
| Would a personal data breach jeopardise the physical health or safety of individuals? |  |

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| **If you have answered yes to any of the above questions, describe your proposed change and its purpose.** |
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| **Please describe the lawful basis for processing personal data and (where relevant) the lawful basis for processing special category personal data.** |
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| **Please describe what personal data will be used and/or affected, where you'll obtain this personal data and whether and to whom you'll disclose any personal data.** | |
| What personal data will be used and/or affected? |  |
| Where will the personal data come from? |  |
| Where will the personal data be stored/processed? |  |
| Where will it be sent to/how will the information be used? |  |
| Will it result in any external organisation processing the data? |  |

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| **Please list all identified privacy risks and the mitigation you are putting in place to minimise or resolve them.** | |
| **Privacy risk** | **Privacy solution** |
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| **Explain why you consider it necessary and proportionate to proceed with the proposal.** |
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| **Recommendation of your Data Protection Officer** | |
|  | |
| Name of Data Protection Officer and date completed |  |
| **Sign off** | |
| Accountable officer:  Approved:  Date: | |

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