Pre-DPIA Assessment Questions - EDUCATION

**Step One**: **To be completed by Education**

*Please give a brief summary of what the project is about and what personal information is involved.*

*Eg what is the project intended to achieve; what information is gathered or used; who is the supplier and where is the data hosted; how long is the data retained and how is it disposed of?*

**Step Two: To be completed by BTS in conjunction with the Data Protection Team**

A) Please tick if your project involves carrying out the following (one or more ticks indicates that a DPIA is required):

**Use systematic and extensive profiling or automated decision making to make significant decisions about people.**

‘Systematic’ may mean occurs according to a system; is pre-arranged, organised or methodical; takes place as part of a general plan for data collection; or is carried out as part of a strategy. ‘Extensive’ implies that the processing also covers a large area, involves a wide range of data or affects a large number of individuals.

** Process special category data or criminal offence data on a large scale**

** Process special category data or criminal offence data on a scale.**

**Use new technologies**

*There is where the processing involves the use of new technologies, or the novel application of existing technologies (including AI).It concerns new developments to the state of technological knowledge in the world at large rather than new technology that is new to the Council.*

*Examples may include: artificial intelligence, machine learning and deep learning; connected and autonomous vehicles; intelligent transport systems; smart technologies (including wearables); market research involving neuro-measurement.*

** Use profiling, automated decision-making or special category data to help make decisions on someone’s access to a service, opportunity or benefit**

Examples may include: credit checks; mortgage or insurance applications; other pre-check processes related to contracts i.e. smartphones.

** carry out profiling on a large scale**

Examples may include: data processed by smart meters; hardware or software offering fitness/lifestyle monitoring; social media networks.

**Process biometric or genetic data.**

*This applies to any processing of genetic data, other than that processed by an individual GP or health professional for the provision of health care direct to the data subject.*

*Examples may include: facial recognition systems; workplace access systems/identity verification; access control/identity verification for hardware/applications (including voice recognition/fingerprint/facial recognition). Genetic data includes medical diagnosis; DNA testing and medical research.*

**Combine, compare or match personal data from multiple sources.**

Examples may include: fraud prevention; direct marketing; monitoring personal use/uptake of statutory services or benefits.

**Process personal data without providing a privacy notice directly to the individual**

Examples may include: direct marketing; online tracing by third parties; online advertising; data aggregation platforms; re-use of publically available data.

**Process personal data in a way which involves tracking individuals’ online or offline location or behaviour**

*For example, automatic number plate recognition; audio or video surveillance of public areas; data processing in the workplace; data processing in the context of home and remote working; processing location of employees.*

** 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 which could result in a risk of physical harm in the event of a security breach**

*Examples may include: whistleblowing/complaint procedure; social care records.*

Or

B) Please tick if your project involve planning to carry out any other (a combination of these factors indicates the need for a DPIA unless the processing is unlikely to result in a high risk):

**Evaluation or scoring.**

**Automated decision-making with significant effects.**

**Systematic monitoring.**

**Processing of sensitive data or data of a highly personal nature.**

**Processing on a large scale.**

‘Large scale’ is not defined but you should consider: the number of individuals concerned; the volume of data; the variety of data; the duration of the processing; and the geographical extent of the processing.

Examples may include: tracking individuals using a city’s public transport system; an insurance company or bank processing customer data; a telephone or internet service provider processing user data; a hospital (but not an individual doctor) processing patient data. Other examples are social care records; fraud prevention and trade union membership.

Individual professionals processing patient or client data are not processing on a large scale.

**Processing of data concerning vulnerable data subjects.**

**Innovative technological or organisational solutions.**

**Processing involving preventing data subjects from exercising a right or using a service or contract**

**Processing in any major project involving the use of personal data.**

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| *(to be completed by the DPO or the DP Team)*  Is a DPIA required YES/NO  Reasons for decision (including any decision that processing is unlikely to result in a high risk):  Name of person making decision and date: |