**PRIVACY IMPACT ASSESSMENT**

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| **Project Title:** |

The aim of this Privacy Impact Assessment (PIA) is to help the University identify the privacy risk (the risk of harm through use or misuse of personal information) of new projects, proposals or policies and to help ensure that any potential problems are addressed at an early stage. The format of the PIA is intended to allow the process to be integrated with the University’s existing project management procedures.

When filling in your PIA you should refer to the Guidance Notes which provide more detailed information about the types of issues you may need to think about when completing this form.

**PART 1 - WHEN SHOULD A PIA BE USED?**

Before embarking on any new project, proposal or policy, including the purchase of new software or a new research project, you should consider whether a PIA is required. The following questions may help you to decide whether a PIA may be necessary or whether you need to take further advice.

**If your answer to any of the questions below is ‘yes’ or ‘maybe’ then please complete Steps 1, 2 and 3 of Part 2 of this form and return it to the University Archivist and Records Manager** ([a.cameron-williams@hud.ac.uk](mailto:a.cameron-williams@hud.ac.uk))

**SCREENING QUESTIONS**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | Maybe | No |
| Will the project involve the collection of new information about individuals? |  |  |  |
| Will the project compel or request individuals to provide information about themselves? |  |  |  |
| Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? |  |  |  |
| Will information about individuals be used for a purpose it is not currently used for, or in a way that is not currently used? |  |  |  |
| Does the project involve using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition? |  |  |  |
| Does the project involve third parties (such as contractors responsible for the development or maintenance of new software) having access to the University’s IT systems where information about individuals is held? |  |  |  |
| Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them? |  |  |  |
| Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, educational records, health records, criminal records or other information that people would consider to be particularly private. |  |  |  |
| Will the project require you to contact individuals in ways which they may find intrusive? |  |  |  |

**PART 2 - PRIVACY IMPACT ASSESSMENT**

This form is to be completed if answers to the screening questions at Part 1 have indicated that a PIA is or may be required

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| **Date** | | |
| **Person completing this form (please include name, job title, email and telephone number)** | | |
| **STEP ONE – Outline the Project**  **Briefly outline the aims of the proposed project**  **What data is going to be collected, transferred or used?**  **Where will it be collected from?**  **How will the data be used?**  **Why is this necessary?**  **How will this benefit the University?**  **How will this benefit the individual whose data is being used?**  **Will this benefit any third parties?** | | |
| **STEP TWO – DESCRIBE THE INFORMATION processes**  **Describe how information relating to individuals’ personal data will be collected, used, stored and deleted**   * **How will the information be collected** * **How will the individuals be informed of why/how their data is collected?** * **Who will have access to the information (including third parties external to the University)?** * **How many individuals are likely to be affected by the project?** * **Where will the data be stored (physically and/or electronically)** * **How long will you need to keep the data for?** * **When and how will it be destroyed (please explain by reference to the University retention schedules – speak to Records Management if you are unsure)** | | |
| **Consultation**  In the boxes below list the relevant parties who need to be consulted about this project | | |
| **Internal stakeholders** | **External stakeholders** | **Other third parties** |
| How will you carry out the consultation and at what stage of the project management process? | | |

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| **STEP THREE – IDENTIFY THE PRIVACY AND RELATED RISKS**  **Identify any key privacy risks and the associated compliance and corporate risks. Please see the attached guidance notes for the types of risks you should be considering.** | | | |
| **Issue** | **Risk to individuals** | **Risk to the University** | **Compliance risk** |
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| **STEP FOUR – IDENTIFY THE PRIVACY SOLUTIONS**  **Describe the actions you could take to reduce the risks and evaluate those actions. Remember the aim of a PIA is not just to eliminate a privacy risk, you can also reduce or accept the risk, if it cannot be eliminated.** | | | |
| **Risk** | **Solution(s)** | **Result: is the risk eliminated/reduced/accepted** | **Evaluation: is the final impact justified, compliant and a proportionate response** |
|  |  |  |  |

**Once you have completed Step 4 please send the form to the University Archivist and Records Manager** ([a.cameron-williams@hud.ac.uk](mailto:a.cameron-williams@hud.ac.uk))

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| **For University Archivist and Records Manager’s and Process/System Owner’s use only** | | | | | |
| **STEP Five – SIGN OFF AND RECORD THE PIA OUTCOMES**  **This is a key part of the process; it is important that a record is kept of what privacy solutions are being taken forward, the risks identified and whether they are to be eliminated, reduced or accepted. See the guidance notes for who can sign off this form.** | | | | | |
| **Risk** | **Approved Solution** | | **Approved By (Process/System Owner)** | | |
|  |  | |  | | |
| **STEP six – INTEGRATE THE PIA OUTCOMES BACK INTO THE PROJECT PLAN**  **Who is the contact for any privacy concerns in the future?**  **Dates for reviewing the privacy outcomes should be included if this is a long-term project (more than 12 months)** | | | | | |
| **Action to be taken** | **Date for Completion of Action** | | **Responsibility for Action** | | |
|  |  | | **Responsibility at outset** | | **Review Dates** |
| **Signed.................................** | | **Position.......................................** | | **Date.........................................** | |
| **See the Guidance notes for who should sign off this PIA** | | | | | |