**Initial Data Risk Assessment (General)**

If you are considering a project (eg purchasing software, marketing, surveying stakeholders) which will involve using or processing personal data you should complete this form. This will help ensure you are complying with Data Protection legislation and will determine whether there are any risks in processing the personal data. If there are risks, you may need go on to the next stage and complete a full Data Protection Impact Assessment.

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| 1. **The Proposed Activities**
 | **Examples** |
| **Name / main contact** |  | *John Smith*  |
| **Name of school or directorate**  |  | *Estates and Campus Services* |
| **Description of your proposed activity or project** |  | *Software called Cleana to manage cleaning rota*  |
| **Names of product and companies involved** |  | *Cleana is supplied by Sparkle plc* |
| **What type of personal data are you collecting /using / sharing?[[1]](#footnote-1)** |  | *Names of cleaners, email addresses, times of shifts* |
| **Why are you collecting this data?[[2]](#footnote-2)** |  | *Need to ensure a record of who cleans when*  |
| **How are you collecting the data?** |  | *Inputting from agreed timetable, only limited people will input data* |
| **Where are you storing the data? Will it be secure?** |  | *On Cleana which is cloud based - have completed a Cloud Security assessment* |
| **How long will the data be kept?** |  | *Deleted annually*  |
| **Are you sharing the data? Why and who with?**  |  | *Only with limited people in the Directorate who need to know* |
| **How are you sharing the data?** |  | *Through controlled log in to Cleana from managed devices only* |
| **Will the data be anonymised or pseudonymised? If so when?[[3]](#footnote-3)** |  | *No* |
| **How will you inform the participants of all of this? How will you get their consent?** |  | *Covered in the staff privacy notice and staff told verbally* |
| **Any other parties involved?** |  | *No, Sparkle is the only company involved* |

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| 1. **Risk Screening Questions**
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|  | **Y/N** |
|  | **Types of data** |  |
| 1 | Do the activities involve special category data?* personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs;
* trade-union membership;
* genetic data, biometric data (processed to identify a human being);
* health-related data;
* data concerning a person’s sex life or sexual orientation;
* data relating to criminal allegations / activity.
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| 2 | Do the activities involved data relating to children or vulnerable adults? |  |
|  | **Types of processing** |  |
| 3 | Do the activities involve the use of personal data which are not covered in a privacy notice?  |  |
| 4 | Are you using non-University systems to collect, store, use or share the data? |  |
| 5 | Are you sharing the data outwith the University? |  |
| 6 | Do the activities involve systematic and extensive profiling or automated decision-making to make significant decisions about people?[[4]](#footnote-4) |  |
| 7 | Do the activities involve systematic monitoring of a publicly accessible place on a large scale? [[5]](#footnote-5) |  |
| 8 | Do the activities involve the use of new technologies eg AI? e.g., big data, artificial intelligence, and algorithms, as well as the Internet of Things, block-chain technology, facial recognition, new types of profiling, and 'deep fake' technology |  |
| 9 | Do the activities involve combining, comparing or matching personal data from multiple sources?  |  |
| 10 | Do the activities involve tracking individuals’ online or offline location or behaviour?  |  |
| 12 | Do the activities involve using data which could result in a risk of physical or mental harm in the event of a security breach or could there be a risk of harm to others by collecting the data?  |  |
| 13 |  Is this a major initiative for the University?  |  |

Please discuss this form with your line manager. If you are satisfied that you have the correct data management processes in place as outlined in Part 1 and if you have answered no to all questions in Part 2 you are clear to proceed with your project. Please save this form as proof of your risk assessment.

If you or your line manager have concerns about your answers to Part 1 or have answered yes to any of the questions in Part 2 you may need to complete a full [Data Protection Impact Assessment](https://www.dundee.ac.uk/corporate-information/data-protection-template-research-projects) with the help of Information Governance to ensure the correct data management measures are in place to reduce any risk. You might find [this](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/) guidance on when to do a DPIA useful.

Please send this form to Information Governance at dataprotection@dundee.ac.uk if this is the case.

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| **DECLARATION – I HAVE COMPLETED THIS IDRA AND PROVIDED ANSWERS TO THE BEST OF MY KNOWLEDGE AND BELIEF**  |
| **Your details** | Name: Role: |
| **Date** |  |
| **Signature** |  |

**Revised January 2024**

1. Personal data is any information about an identifiable living individual. [↑](#footnote-ref-1)
2. Only collect the personal data that you really need for your project. [↑](#footnote-ref-2)
3. Anonymised: any personal information is removed so you can no longer identify individuals eg aggregated or statistical data. Pseudonymised: data that can no longer be attributed to an individual without the use of data held separately. [↑](#footnote-ref-3)
4. This is likely to be using software to evaluate characteristics of people or to make decisions about them – if you are doing this extensively or in large numbers and using this information to make significant decisions about them choose yes. [↑](#footnote-ref-4)
5. Likely to be via CCTV or similar. [↑](#footnote-ref-5)