Imperial College London

Student Data Federation to Dept of Computing
Data Protection Impact Assessment

Document Information	
Document Status and Version	*Final V1.0*
Author(s)	[redacted]
Information Asset Owner	[redacted] *Dept of Computing Computing Support Group (CSG)*
Name of department and faculty or Support Services	*Dept of Computing, Faculty of Engineering*

Version History	Version Date	Requestor of Change	Summary of Changes
V1.0	*1st Oct 2019*		*First Version*
V1.1	*08/10/19*	[redacted]	*Review / Finalisation*

Proposed date for the activity/project/process/initiative commencement	1st Oct 2019 (but not before approval of DPIA)

Proposed date for the activity/project/process/initiative completion	Processing of student data in this way will be ongoing, with a new set of students being enrolled each academic year.

Please note that the College may disclose completed DPIAs where it is required to do so by law (including the Freedom of Information Act), by any applicable governmental or other regulatory authority, or by order of a court. For further information as to what to disclose if required under FOIA please contact the Legal Services Officers at foi@imperial.ac.uk.

Completed DPIAs may also be published internally for organisational learning and awareness so please advise the Data Protection Officer of any concerns to ensure these are duly considered/mitigated. The Data Protection Officer can be contacted at data-protection@imperial.ac.uk

All entries listed in blue are examples and for guidance only

Part 1 - DPIA Summary

Name, job title and contact details of the nominated Information Asset Owner*	
Information Asset Owner name and job title	[redacted] Computing Support Group, Dept of Computing
Information Asset Owner contact details	[redacted] help@doc.ic.ac.uk

***Information Asset Owners**

Any activity, project, process or initiative proposed to involve the processing of personal data[1] should have a designated Information Asset Owner. Information Asset Owners are responsible for assessing information security and privacy risks annually for their information assets and implementing appropriate measures accordingly. Accordingly, the Information Asset Owners are responsible for completing a DPIA in respect of the relevant activity/project/process or initiative (as is applicable).

Information Asset Owners are also responsible for recording the existence and details of their information assets in the College's Information Asset Register (which is in the process of being rolled out in College).

What scenario best describes the purpose for the DPIA?		
Activity/Non-research project: *Yes*	Supplier: *No*	Research: *No*

[1] For the definition of personal data please see as follows; https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/processing-personal-data/

Outline the project / supplier requirements / research and its objectives (if processing is due to a statutory requirement please explain)?
The College is moving towards a single central Source Of Truth for student records. In order to effectively manage teaching logistics within our Department, we copy required data about students enrolled in our programmes into a database held within our department. This database will then be used for recording data such as tutor-tutee relationship, module subscription, project supervision relationships, and which students are in which classes, taking which courses etc. This allows us to effectively manage and deliver teaching to the students studying on our courses. *Currently our local database is updated by extracting data from DSS. In future, the preferred route for federation of student data (as discussed with* [redacted] *from ICT) is for messages to be sent from the central system to departmental systems each time there is an update to a student record. To facilitate this we are implementing a service that can be passed each new message, and each message will be stored in a database, for the purposes listed above.*

List of stakeholders consulted during the DPIA Process (if pertinent, include names / roles for any persons involved thus far <u>and</u> include their feedback within the DPIA)	
[redacted]	[redacted] suggested that the data processing being planned here fell under the College's existing *Privacy Notice for Students and Prospective Students* as the data is needed in order to effectively deliver their education. We are not generating or recording new data, just performing existing processes in a different way.

<u>Part 2 - Identifying the need for a DPIA</u>

The following screening questions are intended to help you decide whether a full Data Privacy Impact Assessment (DPIA) is necessary. Answering yes to any of the below listed questions means that a full DPIA is necessary and therefore, you must complete all of Parts 3 through 9 (inclusive) of this document. If a full DPIA is **not** required please progress to Part 9.

Activity	**Yes or No**
Will you be processing / collecting special categories of personal data or data which is likely to raise privacy concerns e.g. health records?	No
Will you be evaluating, scoring, profiling or predicting individuals' behavior?	No
Will there be automated decision making about individuals with legal or similar effects?	No

Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	No
Will the project include systematic monitoring, observing or controlling personal data?	No
Will you be carrying out large scale processing of personal data? (This could include large volumes of data, large population of data subjects, length of processing or geographical extent of data)	No
Will you be combining or matching datasets or collecting and creating new information about individuals?	No
Will you be collecting the personal data of vulnerable individuals?	No
Will you be deploying a new or innovative use of technology to process personal data?	No
Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics, facial recognition or tracking.	No
Is data likely to be transferred outside of the European Union?	No
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? For example, UCAS, NHS, other Universities	No
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	No
Will the project involve the processing of personal data by third parties (third parties would include all cloud based services, webinar platform providers etc.)?	No
Will the project expose personal data to elevated levels of security risks? Could the processing result in physical harm to individuals if a breach were to occur?	No

Once these questions have been completed please contact the College's Data Protection Officer at data-protection@imperial.ac.uk for review and guidance.

Part 3 - Data Protection Officer Comments

Having reviewed the answers to Part 1 & 2 I am satisfied the activity can continue based on the proposal stipulated and is deemed compliant with the regulations and legal basis for us to do so. I also do not feel the activity poses a high risk to data subjects or their personal data so a full DPIA is not required.

The activity will in fact improve the practices currently conducted by the College which will improve data handling / processing activities in comparison to current protocols.

However, for clarity and for the authors guidance. The author should be aware that this document remains a 'live' document, therefore, as the process continues and / or further information / learning comes to light then it must be filtered back into the DPIA to ensure the parameters of the original discussion and associated risk have not changed, see Part 5 for more information.

[redacted]03/10/19

Part 4 - Sign off / Approvals

At the end of the assessment, the DPIA with the proposed solutions should be signed off as follows:

Sign off by the Information Asset Owner:

1. where only the screening questions in Part 2 have been completed; or
2. where the full DPIA has been completed and satisfactory solutions are found to any identified risks;

and, in each case, (i) no sensitive personal data is proposed to be processed as part of the activity/project/process or initiative (as applicable) and (ii) the activity/project/process or initiative will not involve the processing of personal data about 250 or more individuals, the Information Asset Owner is authorised to sign off the completed DPIA in consultation with the local Data Protection Co-Ordinator (if one has been nominated).

Where the Information Asset Owner is uncertain as to whether he/she is able to sign off on a given DPIA or uncertain about any GDPR compliance aspects, he/she should contact the College's Data Protection Officer for further guidance.

Sign off by the Information Asset Owner, the College's Data Protection Officer and the Compliance and Information Governance Manager:

1. where sensitive personal data is proposed to be processed as part of the activity/project/process or initiative (as applicable); and/or
2. where the Information Asset Owner is not able to identify satisfactory solutions to any identified risks or is uncertain as to whether any solutions appropriately address the identified risks; and/or
3. where the activity/project/process or initiative (as applicable) will involve the processing of personal data about 250 or more individuals,

the Information Asset Owner should approve the completed DPIA herself/himself and then seek a further sign off on the DPIA from the College's Data Protection Officer and the Compliance and Information Governance Manager.

Information Asset Owner	**Data Protection Officer**	**Compliance and Information Governance Manager**
[redacted] .... **Signature**	[redacted] .... **Signature**	**N/A** .... **Signature**
[redacted] .... **Name**	[redacted] .... **Name**	**N/A** .... **Name**
04/10/2019 .... **Date**	**08/10/19** .... **Date**	**N/A** .... **Date**

Part 10 – Record keeping

There should be a permanent record of who signs off any DPIA and when this took place. Accordingly, each Information Asset Owner must:

- retain a copy of the final completed DPIA for his/her records (regardless of whether only the screening questions have been completed or the full DPIA has been completed); and
- send a copy of the final completed DPIA to the local Data Protection Co-Ordinator (if one has been nominated) (regardless of whether only the screening questions have been completed or the full DPIA has been completed); and
- send a copy of the final completed and approved DPIA to the College's Data Protection Officer (regardless of whether only the screening questions have been completed or the full DPIA has been completed).

If any approval is granted on the basis that certain actions are to be taken by a set deadline and those actions are not completed by that deadline, the Information Asset Owner should bring this to the attention of the approvers and suggest appropriate remedial action.

Part 11 – Further information / guidance

For more information / guidance on the creation and use of DPIA's please contact the Data Protection Officer and/or view the following:

Information Commissioner's Office - Guide to the General Data Protection Regulation (GDPR) page 100
Information Commissioner's Office - Data Protection Impact Assessments (DPIAs) guidance
Article 29 Working Party - Guidelines on Data Protection Impact Assessments