

UCL DATA IMPACT ASSESSMENT TEMPLATE FOR RESEARCH

Why do we need to complete this information? For UCL's Chief Information Officer (CIO) Unit (Data Protection) (m1 t)-4 (ne)-1 legislation it is a legal requirement to complete a DPIA in the following circumstances:

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- when data processing is likely to result in a high risk of harm to individuals, e.g. new, invasive data processing policies
 - when large volumes of personal data are processed, e.g. use of behavioural profiles based on website usage
 - when processing special category personal data on a large scale, e.g. genetic tests to assess and predict the disease/health risks
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International transfers of personal data

International transfers of personal data

- Will personal data be transferred outside the EU?
- If so, what adequate safeguards will be put in place e.g. h ^ š v Œ } v š Œ š μ o o μ
- Has the party to whom the data is being transferred been subject to a due diligence exercise to determine their security and handling of personal data to ensure compliance with UCL's standards and the Data Protection Laws?

In July 2020 The Court of Justice of the European Union (CJEU) passed judgement with wide ranging implications for international transfers of personal data. The judgement invalidated the EU-US Privacy Shield (a mechanism to enable data transfer to the US) though the wider impact is that all international transfers should be individually risk assessed and measures put in place to ensure that EU standards for data protection are met.

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Project Information			
Project Name			
Research Objectives			
Primary Objectives			
Stakeholders			
Stakeholder Group			
Data Collection Methods			
Methodology			
Ethical Considerations			
Ethical Approval			

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Step 5– International Data Transfer		
Consideration	Answer	Guidance notes
Is the data being transferred outside the UK or EEA		As set out above all data transfers outside the UK/EEA now carry some risk. It is important to ensure that appropriate technical measures are in place to protect the data, such as encryption. You should explain where personal data is being transferred to
Will SCCs be put in place to cover the data transfer in questions?		It is strongly recommended that SCCs are in place for all international data transfers although they do not eradicate all risk as outlined above.

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Is the data transfer unique to UCL or part of common service?		Data transfers deriving from use of popular/widespread services may carry less risk that a complaint would be made to UCL specifically.
Does the processing / data transfer help adherence to other data protection requirements?		For example, a project to standardise UCL activity with one selected supplier would carry considerable benefits for data accuracy, data minimisation, purpose limitation etc. These benefits may partially mitigate the risks associated with a transfer.
Does the third party demonstrate a decent level of GDPR compliance?		For example, do they still rely on the Privacy Shield or do they explain how they comply with the GDPR?
Conclusion: Based on the above risk assessment,		



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Step 5 - What steps or controls are you taking to minimise risks to privacy?

Please tick

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| <ul style="list-style-type: none"> a. Risks to individual privacy are minimal b. Personal data is pseudonymised c. Encryption of data at rest, i.e. when stored d. Encryption used in transfers e. Total number of participants is less than 50 f. Information compliance training for staff has been completed data protection, information security, FOI g. Hashing or salting employed h. Adherence to privacy by design principles i. Probabilistic risk management | <ul style="list-style-type: none"> j. Special category personal data is not used k. Randomisation l. Participant opt out at any stage of the research m. Personal data kept in the EEA n. Research is not used to make decisions directly affecting individuals o. De-identification p. Short retention limits q. Restricted access controls r. Other (please specify) |
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