# DPIA Assessment Checklist

The GDPR requires that organisations carry out a DPIA when processing is likely to result in a high risk to the rights and freedoms of data subjects. For a parish examples might include, introducing a new safeguarding protocol which involves sharing data with multiple agencies or using CCTV to monitor public areas.

If two or more of the following apply, it is likely that you will be required to carry out a DPIA. This does not apply to existing systems but would apply if you introduced a new system.

|  |  |  |
| --- | --- | --- |
|  | Profiling is in use. Example: you monitor website clicks or behaviour and record people’s interests. | 🞎 |
|  | Automated-decision making. Example: when processing leads to the potential exclusion of individuals. | 🞎 |
|  | CCTV surveillance of public areas. Processing used to observe, monitor or control data subjects. | 🞎 |
|  | Sensitive data. Examples: information about individuals’ political opinions, as well as personal data relating to criminal convictions or offences. | 🞎 |
|  | Large scale data processing. There is no definition of “large scale”. However consider: the number of data subjects concerned, the volume of data and/or the range of different data items being processed. | 🞎 |
|  | Linked databases - in other words, data aggregation. Example: two datasets merged together, that could “exceed the reasonable expectations of the user”. E.g. you merge your mailing list with another church, club or association. | 🞎 |
|  | Data concerning vulnerable data subjects, especially when power imbalances arise, e.g. employee-employer, where consent may be vague, data of children, mentally ill, asylum seekers, elderly, patients. | 🞎 |
|  | “New technologies are in use”. E.g. use of social media, etc. | 🞎 |
|  | Data transfers outside of the EU. | 🞎 |
|  | “Unavoidable and unexpected processing”. For example, processing performed on a public area that people passing by cannot avoid.  Example: Wi-Fi tracking. | 🞎 |

**A more detailed DPIA Assessment Checklist & guidance can be found** [**online here**](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/)**.**