

APPENDIX A: DPIA Screening Questions

The following screening questions should be completed **prior** to a Data Protection Impact Assessment (DPIA).

The Screening Questions provide an initial assessment, which should be completed at the project initiation stage, for new or significantly changed processes. This document will enable us to identify stakeholders, make an initial assessment of privacy risk and decide if a DPIA is necessary.

Definitions can be found at the end of this document.

Please return the completed form to information.governance@hee.nhs.uk

Administrative information

Project title	New NHS Education Contract
Your name	Pete Scott
Your team and directorate	Education Funding Reform, Finance.
Your location	Blenheim House
Your telephone number	07717 513554
Your email address	pete.scott@hee.nhs.uk
Name and contact details of the Project Manager / Lead, if not you.	Adam Layland, Head of Commissioning. adam.layland@hee.nhs.uk
Information Asset Owner (IAO) <i>Senior member of staff responsible for data's handling and management.</i>	
Information Asset Administrator (IAA) <i>Member of staff who processes the data regularly at an operational level.</i>	

Purpose of the project

In brief, what is the purpose of the project and how is the processing of information necessary to that work?	<p>Stakeholder survey, through Bristol Online Surveys hosted on the HEE website, requesting feedback regarding proposals for a new NHS Education Contract to replace the current Learning and Development Agreement.</p> <p>Stakeholders will be able to self-select to provide feedback. They identify themselves against a stakeholder group, provide feedback in their chosen capacity, and provide a contact email address for further information about the project (not mandatory).</p> <p>The only identifying information requested through the survey is the email address of the participants, and providing this information is</p>
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	<p>optional. Consent will be the legal basis for processing that information.</p> <p>This data will be stored on the Education Funding Reform Sharepoint site, for a period of twelve months.</p>
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Timeframe for the project (estimated)

<p>Start date: 17 August 2020 End date: 17 September 2020</p>
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Nature of the information

<p>Will the information be pseudonymised [3] or anonymised [11]?</p>	<p>N.</p> <p>Data providers will not be required to provide identifying information. However:</p> <ul style="list-style-type: none"> • They will be asked whether they are responding on behalf of themselves or their organisation. • They will be asked their job title (non-mandatory answer) to allow us to categorise their comments. • They will be given the option of providing a contact email address if they would like to be contacted directly about the project following the submission of their feedback.
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Data controller [\[2\]](#)

Is Health Education England the sole data controller [2] for the personal data?	Y
If N, which organisation(s) is HEE sharing this responsibility with?	
Will a third party be processing or hosting this data on HEE's behalf?	N

Screening questions

<p>Approximately, how many data subjects (trainees, members of staff, stakeholders) will have their data collected, processed or stored as a result of this project?</p>	<p>This is unknown at the initial stage.</p> <p>However we are assuming that up to 200 data subjects may complete</p>
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	the five question survey.
Will the project involve introducing new technologies to HEE? If so, does it include privacy enhancing features, such as encryption or two factor authentication (2FA) - <i>such as password + one-time code to mobile phone?</i>	N
Will the processing of personal data occur without informing the individual of the processing? If Y, then why are they not being informed?	N
Will special category data be processed? (Delete category if not applicable).	No special category data to be processed.
Will the project involve automated decision-making or profiling? <i>I.e. computerised analysis and decision-making without human input.</i>	N
Will the processing include any data matching e.g. the combining, comparing or matching personal data obtained from multiple sources? If Y, what and where from?	N
Will the processing include any tracking e.g. processing which involves tracking an individual's geolocation (IP address, mobile phone location etc.) or behaviour?	N
What key stakeholders have you identified? What data will be shared with them? Have they raised any concerns in relation to the data collection, <i>if applicable?</i>	Representatives from: <ul style="list-style-type: none"> • NHS providers • Non-NHS healthcare providers • Higher Education Providers • Medical Schools • Dental Schools • Integrated Care Systems

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[1] anonymous information is information which does not relate to an identifiable person or has been modified in such a manner that the data subject no longer identifiable. The removal of names and email addresses alone may not truly anonymise data. Are there data fields remaining that could lead to the individual being identified?

[2] 'controller' means HEE, alone or jointly with another body, determines the purposes that the data can be used for and who by, for example, this is the case where HEE is obliged by law to carry out a specific function as a public body. If HEE is processing data on behalf of another party then it should be stated under 'Data Controller'.

[3] 'pseudonymisation' refers to the processing of personal data in such a manner

that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identifiable living person. For instance, two separate spreadsheets, each containing half of the data subject's personal identifiers.