**Data Protection Impact Assessment Procedure for WMRGL**

**Introduction**

A Data Protection Impact Assessment (DPIA) is a process that helps identify and minimise risks related to the use of personal data in new or changing projects. It is a legal requirement under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, especially when a project is likely to involve high-risk data processing.

This guide outlines the DPIA process as followed by the WMRGL and provides clear, accessible guidance.

**1. Purpose**

To ensure that all WMRGL staff follow a consistent and legally compliant process for assessing and managing data protection risks associated with new or modified projects involving personal data.

This SOP applies to all projects and systems within the WMRGL that involve the use of personal or sensitive data, including patient, staff or third-party information.

**2. When is a DPIA Required?**

You must complete a DPIA when:

* Your project involves the collection, use, or sharing of personal or sensitive data.
* A new IT system is being introduced.
* An existing system is being upgraded or repurposed.
* Data is shared with a third-party supplier or partner.
* New technology is used that could impact privacy (e.g., apps, cloud storage).

**3. DPIA Procedure**

**Step 1: Screening**

* Complete the DPIA screening questions in the official DPIA tool.
* If any answers are "Yes", proceed to full DPIA.
* Check if an existing DPIA exists in the RGU Genetic Directory: [RGU\_Genetic\_Laboratory - DPIA - All Documents](https://nhs.sharepoint.com/sites/RQ3_BWC_RGU_Genetic_Laboratory/Quality/Forms/AllItems.aspx?id=%2Fsites%2FRQ3%5FBWC%5FRGU%5FGenetic%5FLaboratory%2FQuality%2FDPIA&viewid=8f093368%2D358d%2D4efb%2Da6fc%2D33422c1ae504&csf=1&web=1&e=qVmyAx&CID=cfc9d0ac%2D84b5%2D4b52%2Dbe67%2D347c2ed0b3a7&FolderCTID=0x012000F8FAD37517B02E478457D49080ABDCB8)
* Check DPIA’s approved, DPIA’s currently in progress and DPIA’s rejected folders.

**Step 2: Change App**

* Log into change app and complete governance checks questionnaire, submit to line manager and wait for approval.

**Step 3: Paperwork**

* Next, a DPIA and Third Party Security Questionnaire form need to be completed. A copy of both can be found here:

[RGU\_Genetic\_Laboratory - Forms and templates - All Documents](https://nhs.sharepoint.com/sites/RQ3_BWC_RGU_Genetic_Laboratory/Quality/Forms/AllItems.aspx?id=%2Fsites%2FRQ3%5FBWC%5FRGU%5FGenetic%5FLaboratory%2FQuality%2FDPIA%2FDPIA%20process%2C%20guides%2C%20templates%2FForms%20and%20%20templates&viewid=8f093368%2D358d%2D4efb%2Da6fc%2D33422c1ae504&csf=1&web=1&e=qVmyAx&CID=cfc9d0ac%2D84b5%2D4b52%2Dbe67%2D347c2ed0b3a7&FolderCTID=0x012000F8FAD37517B02E478457D49080ABDCB8)

* Clearly outline the nature, purpose, and goals of the project.
* Map out how data will be collected, stored, shared, and deleted.
* Include any third-party access or international transfers.

**Step 4: Save forms to Change App & SharePoint folder ‘New DPIA’s to be worked on’**

[RGU\_Genetic\_Laboratory - DPIA - All Documents](https://nhs.sharepoint.com/sites/RQ3_BWC_RGU_Genetic_Laboratory/Quality/Forms/AllItems.aspx?id=%2Fsites%2FRQ3%5FBWC%5FRGU%5FGenetic%5FLaboratory%2FQuality%2FDPIA%2FNew%20DPIA%27s%20to%20be%20worked%20on&viewid=8f093368%2D358d%2D4efb%2Da6fc%2D33422c1ae504&csf=1&web=1&e=qVmyAx&CID=cfc9d0ac%2D84b5%2D4b52%2Dbe67%2D347c2ed0b3a7&FolderCTID=0x012000F8FAD37517B02E478457D49080ABDCB8)

* Save forms using naming convention: ‘Project name, Supplier involved, Date’

**Step 5: Reviewing and Approval from Informatics**

* At this point, informatics will be involved and review the forms

**Step 6: Approval**

* Informatics will take the DPIA form to DTBP for approval. Timeframes can vary depending on complexity of the project.
* If other area’s need involvement, you will be notified.
* Final approval lies with the Trusts’ Data Protection Officer.
* Informatics will inform you of decision via email.

**Step 9: Record Keeping & Completion**

* If approved, the approval email will be uploaded to SharePoint alongside the DPIA form for future viewing.
* Approved DPIAs stored in:

[RGU\_Genetic\_Laboratory - DPIA - All Documents](https://nhs.sharepoint.com/sites/RQ3_BWC_RGU_Genetic_Laboratory/Quality/Forms/AllItems.aspx?id=%2Fsites%2FRQ3%5FBWC%5FRGU%5FGenetic%5FLaboratory%2FQuality%2FDPIA%2FDPIA%27s%20approved&viewid=8f093368%2D358d%2D4efb%2Da6fc%2D33422c1ae504&csf=1&web=1&e=qVmyAx&CID=cfc9d0ac%2D84b5%2D4b52%2Dbe67%2D347c2ed0b3a7&FolderCTID=0x012000F8FAD37517B02E478457D49080ABDCB8)

If rejected, stored in:

[RGU\_Genetic\_Laboratory - DPIA - All Documents](https://nhs.sharepoint.com/sites/RQ3_BWC_RGU_Genetic_Laboratory/Quality/Forms/AllItems.aspx?id=%2Fsites%2FRQ3%5FBWC%5FRGU%5FGenetic%5FLaboratory%2FQuality%2FDPIA%2FDPIA%27s%20rejected&viewid=8f093368%2D358d%2D4efb%2Da6fc%2D33422c1ae504&csf=1&web=1&e=qVmyAx&CID=cfc9d0ac%2D84b5%2D4b52%2Dbe67%2D347c2ed0b3a7&FolderCTID=0x012000F8FAD37517B02E478457D49080ABDCB8)

**3.1. Responsibilities**

* **Project Lead/Manager**: Responsible for completing and submitting the DPIA.
* **Information Governance (IG) Team**: Reviews DPIA submissions and provides guidance.
* Nigel Coles – Quality Lead
* Gareth Masson – Data & Informatics Lead
* Chipo Mashayamombe-Wolfgarten – Principal Clinical Bioinformatician
* **Digital Technology Programme Board (DTPB)**: Final approval of projects

**4. Procedure Flowchart**

Identify need for DPIA via DPIA tool screening questions

If any answers yes, DPIA required

If all answers no, DPIA not required

Check if DPIA already exists/ rejected in Sharepoint, if not proceed

Complete governance checks questionnaire on Change App

Complete DPIA and Third Party Security Questionnaire form and save in Change App and SharePoint

Wait for decision and further guidance

**5. Frequently Asked Questions (FAQ)**

**Q: Do I need a DPIA if I’ve done one before for a similar project?**  
**A:** Yes. A new DPIA is required for every new project, even if a **similar** one was previously approved.

**Q: Who can help me complete a DPIA?**  
**A:** The Information Governance Team.

**Q: What happens if I don’t complete a DPIA?**  
**A:** Projects without a DPIA may face delays or rejection. Non-compliance could also lead to legal penalties.

**Q: Is consent from patients always needed?**  
**A:** Not always. DPIAs assess broader privacy impacts, while consent is handled separately as part of care or service delivery.