Sample DPIA template.

This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the Criteria for an acceptable DPIA set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Submitting controller details

Name of controller	Jan du Plessis
Subject/title of DPO	Practice Manager Earls Court Surgery
Name of controller contact /DPO (delete as appropriate)	Brompton Health PCN

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

AI MedReview is a project aimed at enhancing the understanding and utilization of patient feedback, specifically focusing on the Friends and Family Test (FFT) reviews from GP surgeries. The primary goal is to provide healthcare providers with a powerful dashboard that offers deeper insights into patient satisfaction levels by leveraging advanced natural language processing (NLP) and machine learning techniques.

The project involves the following types of processing:

Data Collection: FFT feedback is collected through an online form provided by Tally. The form explicitly instructs users not to enter any personal or patient-identifiable information. It also sign post them to their GP Surgery if they wish to make a complaint.

Sentiment Analysis: The collected feedback undergoes sentiment analysis using the Hugging Face cardiffnlp/twitter-roberta-base-sentiment-latest model. This process determines the emotional tone (positive, negative, or neutral) of patient comments. Model run on a local machine, no data is used in training any models.

Named Entity Recognition (NER): To protect patient privacy, the dbmdz/bert-large-cased-finetuned-conll03-english model from Hugging Face is employed for named entity recognition. This ensures that any personally identifiable information (PII) present in the feedback is anonymized.

Zero-Shot Classification: The Facebook BART-large-mnli architecture is utilized for zero-shot classification, allowing accurate categorization of patient feedback without the need for specialized healthcare training data.

Data Storage and Deletion: The processed and anonymized feedback data is securely stored, with appropriate access controls and data protection measures in place. The data is retained for a specified period, aligned with the purpose and legal basis for processing, and securely deleted when no longer needed.

Summarizing Anonymized Feedback: The AI MedReview project incorporates a feature that allows practice managers to summarize anonymized patient feedback using ChatGPT, a large language model developed by OpenAI. This integration aims to enhance the insights derived from the free-text comments provided by patients in the Friends and Family Test (FFT) feedback. By leveraging the natural language processing capabilities of ChatGPT, practice managers can generate concise and coherent summaries that capture the key themes, sentiments, and actionable points from the anonymized feedback.

To ensure the protection of patient privacy, the FFT feedback undergoes a rigorous anonymization process before being made available to practice managers for summarization. This involves the removal of any personally identifiable information

(PII) from the free-text comments using advanced techniques such as named entity recognition and data masking. The anonymized feedback is then securely accessible to authorized practice managers through the AI MedReview dashboard. Practice managers can input the anonymized feedback into the ChatGPT-powered summarization tool, which generates a condensed version of the feedback while preserving the essential information. The generated summaries assist practice managers in quickly identifying areas for improvement, common concerns, and positive aspects of the patient experience. This enables data-driven decision-making and facilitates the implementation of targeted actions to enhance the quality of care and patient satisfaction.

The use of ChatGPT for summarizing anonymized feedback offers several advantages. Firstly, it saves time and effort for practice managers by automating the process of extracting key insights from large volumes of free-text data. Secondly, ChatGPT's advanced natural language understanding capabilities allow it to capture the nuances and context of the feedback, providing more accurate and comprehensive summaries compared to manual analysis. However, it is crucial to acknowledge that while ChatGPT is a powerful tool, it is not infallible. The generated summaries should be reviewed and validated by practice managers to ensure their accuracy and relevance. Additionally, clear guidelines and training should be provided to practice managers on how to effectively utilize ChatGPT for summarization while adhering to data protection principles and maintaining the confidentiality of the anonymized feedback. Regular monitoring and auditing of the summarization process should be conducted to identify any potential biases, errors, or misinterpretations and to continuously improve the quality and reliability of the generated insights. An audit of the use of this feature is in place. This included the text used for summarization. This is reviewed monthly.

The need for a Data Protection Impact Assessment (DPIA) was identified due to the sensitive nature of the data being processed, which includes patient feedback related to healthcare experiences. Although the data is collected anonymously and measures are in place to protect patient privacy, the use of advanced AI and machine learning techniques on this data could potentially raise privacy concerns.

Additionally, the insights derived from the analysis of the feedback data could have significant implications for healthcare providers and patients alike. Any potential biases, inaccuracies, or misinterpretations in the analysis could lead to inappropriate actions or decisions.

Therefore, conducting a DPIA is crucial to thoroughly assess the data protection risks associated with the AI MedReview project, implement appropriate mitigation measures, and ensure compliance with the General Data Protection Regulation (GDPR) and other relevant data protection laws.

By completing a DPIA, the project can demonstrate its commitment to data protection, transparency, and accountability, while also fostering trust among patients and healthcare providers.

The legal basis for processing and publishing this information falls under Article 6(1)(e) of the GDPR, which states:

"Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller."

In this context, the NHS, as a public authority, has a legal obligation and a public interest in collecting and publishing patient feedback to ensure transparency, maintain quality standards, and facilitate the improvement of healthcare services. Publishing feedback allows patients to make informed choices about their healthcare providers and enables GP surgeries to identify areas for improvement.

However, the NHS must still adhere to the principles of data protection outlined in the GDPR when processing and publishing patient feedback. This includes:

Ensuring that the feedback is collected and processed lawfully, fairly, and transparently.

Collecting only the minimum necessary personal data required for the specific purpose.

Maintaining the accuracy and integrity of the data.

Implementing appropriate technical and organizational measures to safeguard the data.

Respecting the rights of data subjects, such as the right to access, rectify, or erase their personal data.

NHS Friends & Family Test

We value your recent experience with our **GP Surgery** and would be grateful if you could take a few moments to provide us with your **thoughtful feedback**.

Please consider your **entire patient journey**, from the moment you scheduled your appointment with your GP to the consultation itself, including **your interactions with our staff**, the **waiting area**, and any **follow-up communication** or **care** you received.
Your honest assessment of these aspects will help us understand **what we are doing well** and identify areas **where we can improve** to better serve our patients' needs.

Thank you for your feedback!

No Personal Identifiable Information should be shared via this form:
To protect your privacy, we kindly request that you do not include any personal identifiable information in your feedback. Please refrain from sharing your **name, email address, telephone number**, or any other details that could personally identify you.

If you would like to make a **complaint**, please contact your GP surgery directly and follow their complaints procedure. Do not use this form for complaints.
For more information contact us here.

How likely are you to **recommend our service** to friends and family if they needed similar care or treatment? *

- A Extremely likely
- B Likely
- C Neither likely nor unlikely
- D Unlikely
- E Extremely unlikely
- F Don't know

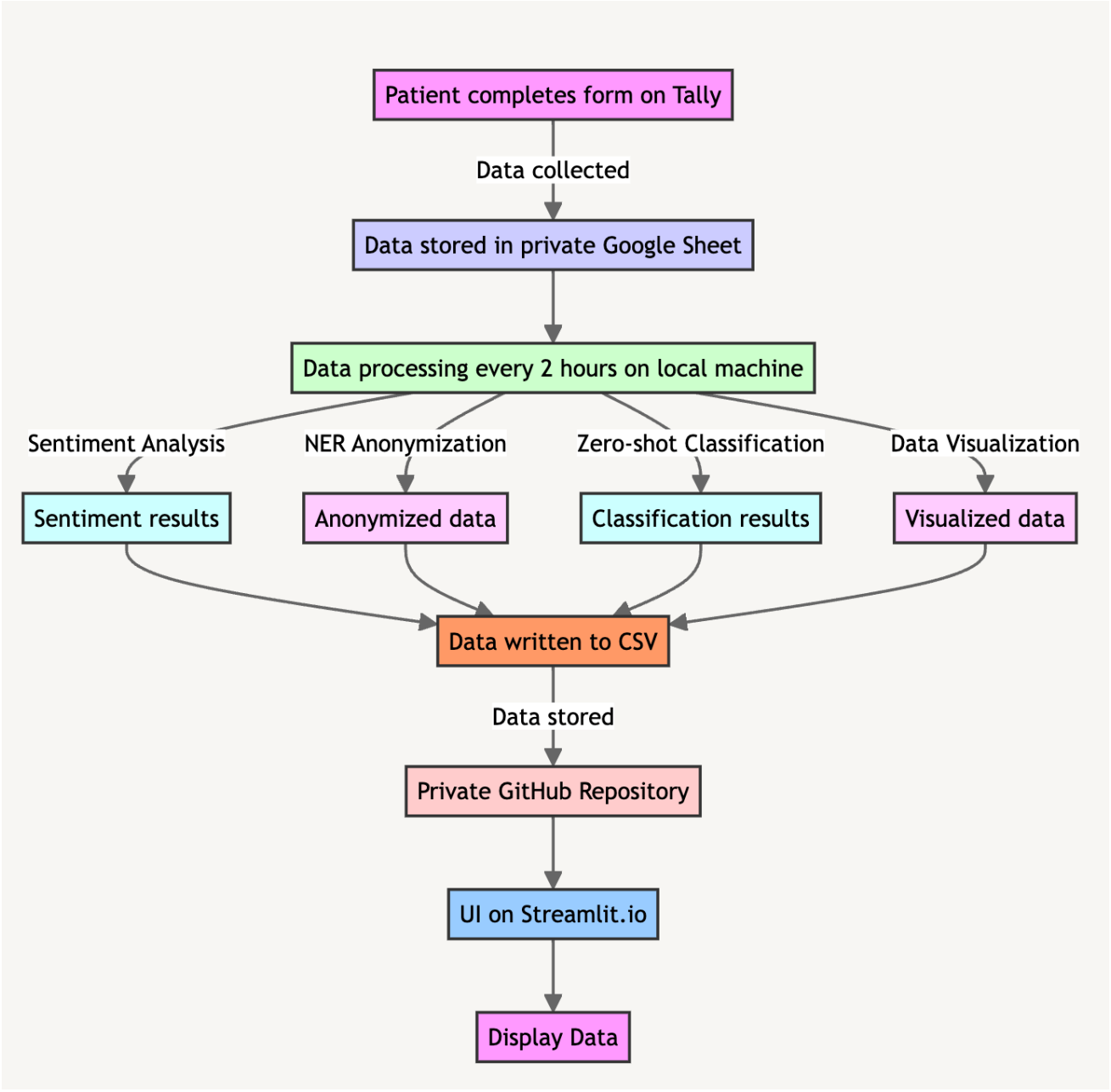
Please tell us **why you feel this way**?

Is there anything that would have made **your experience better**?

Submit →

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?



Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The AI MedReview project focuses on processing Friends and Family Test (FFT) feedback data collected from GP surgeries within the Borough of Kensington and Chelsea, specifically covering all member practices of the Brompton Health Primary Care Network (PCN). The data consists of patient reviews and feedback related to their healthcare experiences.

Nature of the Data:

The data collected through the FFT feedback form is primarily qualitative in nature, consisting of free-text comments provided by patients. The form explicitly instructs patients not to include any personal identifiable information, such as names, email addresses, or telephone numbers. The data is anonymized before being processed and analyzed.

Special Category or Criminal Offence Data:

The FFT feedback data does not intentionally collect any special category data (e.g., health data, racial or ethnic origin) or criminal offence data. However, there is a possibility that patients may inadvertently include such information in their free-text comments. To mitigate this risk, the data undergoes a rigorous anonymization process using named entity recognition (NER) techniques to identify and remove any personally identifiable information, including special category data, before further processing.

Data Volume and Frequency:

Approximately 1,000 reviews are collected monthly from the participating GP surgeries within the Brompton Health PCN. This volume of data allows for a comprehensive analysis of patient sentiment and the identification of areas for improvement.

Data Retention:

The FFT feedback data is stored for a period of 24 months from the date of collection. After this retention period, the data is securely deleted in accordance with data protection regulations and best practices.

Affected Individuals:

The data collection covers the Borough of Kensington and Chelsea, which has a patient population of around 140,000 individuals. All member practices of the Brompton Health PCN participate in the FFT feedback collection process, ensuring a representative sample of the patient population within the borough.

Geographical Area:

The data collection and processing are limited to the geographical area of the Borough of Kensington and Chelsea, located in London, United Kingdom. The insights derived from the analysis of the FFT feedback data are specific to the

healthcare services provided by the GP surgeries within this borough.

Data Usage:

The processed and anonymized FFT feedback data is used by the Brompton Health PCN to gain insights into patient sentiment and identify areas for improvement in the delivery of healthcare services. The PCN leverages advanced natural language processing and machine learning techniques, such as sentiment analysis and zero-shot classification, to analyze the feedback data and extract actionable insights. These insights enable the PCN to make data-driven decisions, allocate resources effectively, and implement targeted initiatives to enhance patient satisfaction and the overall quality of care.

By limiting the scope of data processing to the Borough of Kensington and Chelsea and the member practices of the Brompton Health PCN, the AI MedReview project ensures a focused and manageable approach to analyzing patient feedback. The defined data retention period of 24 months aligns with the purpose of the processing and allows for the timely identification of trends and patterns in patient sentiment.

This document is reviewed annually.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The AI MedReview project processes Friends and Family Test (FFT) feedback data collected from patients who have attended GP surgeries within the Borough of Kensington and Chelsea, specifically those who are registered with member practices of the Brompton Health Primary Care Network (PCN).

Nature of Relationship:

The relationship between the PCN and the individual's providing feedback is that of a healthcare provider and its patients. Patients engage with the GP surgeries for their healthcare needs, and the FFT feedback mechanism allows them to share their experiences and opinions about the services they received.

Control and Expectations:

Patients have control over whether to provide feedback through the FFT form. The feedback is voluntary, and patients can choose not to participate if they prefer. The FFT feedback form clearly communicates the purpose of collecting the data, which is to improve the quality of healthcare services based on patient feedback. Patients are informed that their feedback will be anonymized and used to identify areas for improvement. Given the context of the healthcare setting and the explicit communication about the purpose of the feedback, patients would reasonably expect their anonymized feedback to be used for service improvement initiatives.

Vulnerable Groups:

The FFT feedback invitations are targeted at patients over the age of 18 who have attended their GP surgery in the preceding two weeks. The invitations are sent out by each practice manager to the appropriate patient cohorts. This approach ensures that the feedback is collected from adult patients who have recently interacted with the healthcare services. Children and other vulnerable groups are not specifically targeted for feedback collection in this context.

Prior Concerns and Novel Processing:

To date, there have been no significant prior concerns or security flaws specifically related to the processing of FFT feedback data within the Brompton Health PCN. However, it is important to acknowledge that the use of advanced natural language processing and machine learning techniques, such as sentiment analysis and zero-shot classification, introduces a level of novelty to the processing of patient feedback data. While these technologies have been rapidly evolving and gaining popularity in recent years, their application in the healthcare domain for analyzing patient feedback is still relatively new.

Current State of Technology:

The AI MedReview project leverages state-of-the-art natural language processing models, such as the Hugging Face cardiffnlp/twitter-roberta-base-sentiment-latest model for sentiment analysis and the Facebook BART-large-mnli architecture for zero-shot classification. These models have shown promising results in various domains and are considered to be at the forefront of current technology in this area. However, it is essential to recognize that the performance and reliability of these models may vary when applied to the specific context of healthcare feedback data.

Public Concerns and Ethical Considerations:

The use of AI and machine learning in healthcare is a topic of growing public interest and concern. There are discussions around the potential benefits, limitations, and ethical implications of using these technologies to process sensitive patient data. Concerns may include data privacy, algorithmic bias, transparency, and the interpretability of the results. It is crucial for the AI MedReview project to address these concerns proactively by implementing robust data protection measures, ensuring transparency about the processing activities, and regularly engaging with relevant stakeholders, including patients, healthcare providers, and regulatory bodies.

Approved Code of Conduct or Certification Scheme:

At present, the Brompton Health PCN is not signed up to any specific approved code of conduct or certification scheme related to the processing of patient feedback data using AI and machine learning techniques. However, the PCN is committed to adhering to best practices, industry standards, and relevant regulations, such as the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. As appropriate codes of conduct or certification schemes become available, the PCN will review and consider their applicability to the AI MedReview project.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The primary purpose of processing the Friends and Family Test (FFT) feedback data within the AI MedReview project is to gain valuable insights into patient experiences and satisfaction levels, ultimately leading to the improvement of healthcare services provided by the GP surgeries within the Brompton Health Primary Care Network (PCN).

Objectives:

Understand patient sentiment: By applying advanced natural language processing techniques, such as sentiment analysis, the project aims to gauge the overall sentiment expressed by patients in their feedback comments. This understanding helps identify areas where patients are satisfied or dissatisfied with the healthcare services they received.

Identify areas for improvement: Through the analysis of patient feedback, the project seeks to pinpoint specific aspects of the healthcare experience that require attention and improvement. This could include issues related to appointment scheduling, waiting times, staff communication, or the quality of medical advice provided.

Enhance service quality: By leveraging the insights derived from the feedback analysis, the PCN and individual GP surgeries can make data-driven decisions to enhance the quality of care and patient experience. This may involve implementing targeted initiatives, allocating resources effectively, and addressing identified pain points in the patient journey.

Intended Effect on Individuals:

The primary intended effect on individuals is to improve their overall healthcare experience and satisfaction levels. By listening to and acting upon patient feedback, the PCN aims to create a more patient-centric approach to healthcare delivery. Patients should benefit from the implementation of service improvements that directly address their concerns and needs. This could lead to better access to care, more effective communication with healthcare professionals, and an enhanced sense of being heard and valued as a patient.

Benefits of the Processing:

Benefits for the PCN and GP surgeries:

Gain a deeper understanding of patient needs and preferences.

Identify strengths and weaknesses in the delivery of healthcare services.

Make informed decisions based on data-driven insights.

Allocate resources efficiently to address areas of concern.

Enhance patient satisfaction and loyalty.

Improve the overall quality of care provided

Broader benefits:

Contribute to the continuous improvement of healthcare services within the Borough of Kensington and Chelsea

Share best practices and insights with other healthcare providers and networks

Foster a culture of patient-centered care and responsiveness to feedback

Promote public trust and confidence in the healthcare system

Demonstrate commitment to transparency and accountability in healthcare delivery

By processing the FFT feedback data using advanced AI and machine learning techniques, the AI MedReview project aims to unlock the full potential of patient feedback as a valuable resource for driving healthcare service improvements. The insights gained from the analysis will enable the PCN and individual GP surgeries to make evidence-based decisions, prioritize initiatives, and allocate resources effectively. This, in turn, should lead to tangible benefits for patients in terms of enhanced care experiences, improved health outcomes, and increased satisfaction with the healthcare services they receive.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organization? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Consulting with Individuals:

In the context of the AI MedReview project, seeking individual views on the processing of their anonymized feedback data may not be necessary or appropriate for the following reasons:

Anonymization: The FFT feedback data is collected anonymously, and any personally identifiable information is removed through robust anonymization techniques. This means that the processed data cannot be traced back to specific individuals, making it impractical to seek their views directly.

Voluntary Participation: Patients provide their feedback voluntarily through the FFT form, which clearly communicates the purpose of collecting the data and how it will be used to improve healthcare services. By submitting their feedback, patients implicitly consent to the processing of their anonymized data for service improvement purposes.

Minimal Impact on Individuals: The processing of anonymized FFT feedback data does not have a direct or significant impact on individual patients. The insights

derived from the analysis are used to make service-level improvements and do not result in any decisions or actions that directly affect specific individuals.

However, it is important to ensure that patients are adequately informed about the processing of their anonymized feedback data through clear privacy notices and information provided at the point of feedback collection.

Involving Internal Stakeholders:

Within the Brompton Health PCN, it is essential to involve key internal stakeholders in the DPIA process, including:

Data Controllers: The practice managers of the member GP surgeries within the PCN act as data controllers for the FFT feedback data. Their involvement and input are crucial to ensure that the processing aligns with the PCN's data protection policies and procedures. The project has already engaged with the practice managers, and none of them has raised concerns regarding the processing of anonymized FFT feedback data.

Information Governance Lead: The project has been discussed with the Northwest London GDPR Lead, Mr. Ernest Norman-Williams. Engaging with the information governance lead ensures that the project adheres to the necessary data protection regulations and best practices.

Clinical and Administrative Staff: Involving clinical and administrative staff who interact with patients and handle the FFT feedback process can provide valuable insights into the operational aspects of data collection and processing. Their input can help identify potential risks and suggest improvements to the feedback collection process.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimization? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

When describing compliance and proportionality measures for the AI MedReview project, it is essential to address key aspects of data protection and ensure that the processing of anonymized Friends and Family Test (FFT) feedback data is lawful, fair, and transparent.

Lawful Basis for Processing:

The lawful basis for processing the anonymized FFT feedback data is legitimate interests (Article 6(1)(f) of the GDPR). The Brompton Health PCN has a legitimate interest in analyzing patient feedback to improve the quality of healthcare services and patient satisfaction. The processing is necessary to achieve these interests, and the benefits of the processing outweigh any potential risks to individual rights and freedoms.

Purpose Achievement:

The AI MedReview project aims to achieve the purpose of gaining insights into patient experiences and identifying areas for improvement in healthcare services. By applying advanced AI and machine learning techniques to analyze the anonymized FFT feedback data, the project can effectively uncover patterns, sentiments, and key themes in patient feedback. This enables data-driven decision-making and targeted interventions to enhance service quality.

Alternative Ways to Achieve the Outcome:

While traditional manual analysis of patient feedback is possible, it is time-consuming, resource-intensive, and may not provide the same level of granularity and insights as the AI-powered approach used in the AI MedReview project. The use of AI and machine learning techniques allows for the efficient processing of large volumes of feedback data and enables the identification of subtle patterns and correlations that may be missed through manual analysis.

Preventing Function Creep:

To prevent function creep, the AI MedReview project will adhere to the following principles:

Clearly define the scope and purpose of the processing and ensure that any future changes or expansions are carefully assessed and justified.

Regularly review and update the DPIA to ensure that the processing remains

aligned with the original purpose and does not extend beyond what is necessary.

Implement strict access controls and data governance measures to ensure that the processed data is only used for the intended purposes and not repurposed for unrelated activities.

Data Quality and Data Minimization:

To ensure data quality and data minimization, the AI MedReview project will:

Implement robust data validation and cleansing processes to identify and address any data inconsistencies, errors, or outliers.

Regularly review and update the data collection processes to ensure that only necessary and relevant data is collected.

Apply strict anonymization techniques to remove any personally identifiable information from the FFT feedback data, minimizing the risk of individual identification.

Periodically assess the effectiveness of the anonymization process and make improvements as needed.

Information to Individuals:

Individuals will be provided with clear and concise information about the processing of their anonymized FFT feedback data through privacy notices and information statements at the point of feedback collection. The information will include:

The purpose of the processing and the lawful basis for processing.

The types of data being processed and the anonymization measures in place.

The data retention period and the secure deletion processes.

The rights of individuals, including the right to object to the processing and the right to lodge a complaint with the supervisory authority.

Supporting Individual Rights:

The AI MedReview project will support individual rights by:

Providing clear information on how individuals can exercise their rights, such as the right to object to the processing or the right to lodge a complaint.

Implementing processes to handle and respond to individual rights requests in a timely and effective manner.

Regularly reviewing and updating the data protection policies and procedures to ensure ongoing compliance with individual rights requirements.

Processor Compliance:

To ensure that any processors involved in the AI MedReview project comply with data protection requirements, the following measures will be taken:

Conducting thorough due diligence on processors to assess their data protection practices and security measures.

Establishing clear contractual agreements with processors that outline their responsibilities and obligations with regard to data protection.

Regularly monitoring and auditing processors to ensure ongoing compliance with the agreed-upon data protection standards.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	**Likelihood of harm**	**Severity of harm**	**Overall risk**
Risk: Incomplete or ineffective anonymization of FFT feedback data Source of risk: Inadequate anonymization techniques or human error in the anonymization process Potential impact on individuals: Identification of individuals from the feedback data, leading to a breach of privacy and potential misuse of personal information Associated compliance and corporate risks: Non-compliance with GDPR and data protection regulations, reputational damage, loss of patient trust	Medium Low	High Moderate	High Moderate
Risk: Unauthorized access to or disclosure of anonymized FFT feedback data Source of risk: Insufficient access controls, security vulnerabilities, or human error Potential impact on individuals: Exposure of sensitive feedback information, potential misuse or exploitation of the data Associated compliance and corporate risks: Breach of data confidentiality, non-compliance with data protection regulations, reputational damage, financial penalties	Moderate	High	High
Risk: Biased or discriminatory outcomes from AI and machine learning analysis Source of risk: Inherent biases in the training data or algorithms used for analysis Potential impact on individuals: Unfair or discriminatory treatment of certain patient groups, perpetuation of existing biases in healthcare services Associated compliance and corporate risks: Non-compliance with anti-discrimination laws, reputational damage, loss of patient trust	Low	Moderate	Moderate

Risk: Misinterpretation or misuse of the insights derived from the FFT feedback analysis Source of risk: Lack of understanding or misapplication of the analytical results by decision-makers Potential impact on individuals: Inappropriate or ineffective changes to healthcare services, potential negative impact on patient care and satisfaction Associated compliance and corporate risks: Reputational damage, loss of patient trust, financial losses due to misdirected resources	Low	Low	Low
Risk: Insufficient transparency and communication about the processing of FFT feedback data Source of risk: Inadequate privacy notices or lack of clear information provided to individuals Potential impact on individuals: Lack of awareness about how their feedback data is being used, inability to exercise individual rights effectively Associated compliance and corporate risks: Non-compliance with GDPR transparency requirements, reputational damage, loss of patient trust	Low	Moderate	Moderate
Risk: Retention of FFT feedback data beyond the necessary period Source of risk: Absence of clear data retention policies or failure to adhere to defined retention periods Potential impact on individuals: Prolonged storage of sensitive feedback data, increased risk of unauthorized access or misuse Associated compliance and corporate risks: Non-compliance with GDPR data retention principles, reputational damage, financial penalties	Moderate	Moderate	Moderate
Risk: Lack of regular monitoring and auditing of the AI MedReview project Source of risk: Insufficient oversight and governance of the project's data protection practices			

Potential impact on individuals: Undetected data protection issues or risks, potential non-compliance with regulations			

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved**
Risk: Incomplete or ineffective anonymization of FFT feedback data	Options to reduce or eliminate risk: Implement robust anonymization techniques, such as k-anonymity or differential privacy, to ensure the effective removal of personally identifiable information Regularly review and update the anonymization process to address any identified weaknesses or vulnerabilities. Conduct periodic audits and assessments of the anonymized data to verify the effectiveness of the anonymization techniques Effect on risk: Reduced Residual risk: Low Measure approved: Yes	Reduce	Low	Yes
Risk: Biased or discriminatory outcomes from AI and machine learning analysis	Options to reduce or eliminate risk: Conduct thorough bias testing and validation of the AI and machine learning models used for analysis Implement fairness and diversity metrics to monitor and mitigate potential biases in the analytical results	Reduce	Low	Yes

Risk: Unauthorized access to or disclosure of anonymized FFT feedback data	Regularly review and update the training data and algorithms to ensure they remain unbiased and non-discriminatory Engage with AI ethics experts to provide guidance on identifying and addressing potential biases Options to reduce or eliminate risk: Implement strong access controls and authentication mechanisms to ensure only authorized personnel can access the anonymized data Encrypt the data at rest and in transit to protect against unauthorized access or disclosure Conduct regular security audits and vulnerability assessments to identify and address any potential security weaknesses Provide staff with data protection and information security training to minimize the risk of human error Effect on risk: Reduced Residual risk: Low Measure approved: Yes	Reduce	Low	Yes
Risk: Misinterpretation or misuse of the insights derived from the FFT feedback analysis	Options to reduce or eliminate risk: Provide clear guidance and training to decision-makers on how to interpret and apply the analytical results appropriately	Reduce	Low	Yes

	Establish a governance framework that outlines the proper use and limitations of the insights derived from the analysis Regularly review and validate the analytical results to ensure their accuracy and reliability Engage with subject matter experts to provide context and guidance on the appropriate use of the insights			
Risk: Retention of FFT feedback data beyond the necessary period	Options to reduce or eliminate risk: Establish clear data retention policies that specify the maximum retention period for the FFT feedback data Implement automated processes to delete or anonymize the data once the retention period has expired Regularly review and audit the data retention practices to ensure compliance with the defined policies Provide training to staff on the importance of adhering to data retention requirements	Reduce	Low	Yes
Risk: Lack of regular monitoring and auditing of the AI MedReview	Options to reduce or eliminate risk: Establish a robust governance framework that includes regular monitoring	Reduce	Low	Yes

project	and auditing of the project's data protection practices Assign clear roles and responsibilities for overseeing the project's compliance with data protection regulations Conduct periodic audits and assessments to identify and address any data protection risks or issues Engage with external auditors or data protection experts to provide independent oversight and validation			

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Jan du Plessis	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA