2.11.3 **Data Protection Risk Assessment (‘DPRA’)**

You are required to complete this section because it has been determined that personal data you are collecting requires a Data Protection Risk Assessment (‘DPRA’).

The questions in this section will assess the risk to the personal data processed for your research project and determine whether a further, more detailed assessment - a Data Protection Impact Assessment (‘DPIA’) - will be required.

‘Data protection by design’ means embedding data privacy features and data privacy-enhancing technologies directly into the design of a project at an early stage. This will help to ensure increased protection for individual data privacy throughout the lifecycle of a research project. A key component of data protection by design is the DPIA.

**What is a DPIA and why may it be required / beneficial for a Research Project?**

A DPIA is a process designed to identify risks arising from the processing of personal data and to manage these risks from as early as possible during the lifecycle of the project. It also demonstrates compliance with the GDPR.

It is a mechanism for assessing the impact of new initiatives or new technologies and implementing measures to minimise or reduce associated risks.

DPIA completion is frequently required as a key component of research project design.

A DPIA is particularly important in instances where the research utilises new technologies or, taking into account the nature, scope, context and type of processing, is likely to result in a high risk to the rights and freedoms of individuals.

The DPIA process and outcomes will help to improve the design of a research project and enhance communication about data protection risks with relevant stakeholders such as research partners, third parties and participants.

Please review the Questions and associated Guidance in the section below. If you answer ‘Yes’ to two or more of the Questions then your research project will require a DPIA.

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<tr>
<th>Question</th>
<th>Help Text</th>
<th>Guidance</th>
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| 2.11.3.3 Does the project use personal data on a large scale? (NB large scale does not equate to large number) | See Guidance - please review carefully before answering.                  | Please see the questions and examples below to determine if your research involves processing on a large scale. The following examples are for guidance only and your answer to this question should not be limited to these examples.

1. Does the research project process personal data relating to a relatively large number of individuals, either as a specific number or as a proportion of the relevant population?

   E.g. Research that uses personal data relating to hundreds of individuals / Research that uses personal data relating to 20 individuals with a rare disease from a total population of 100 individuals who have the disease. Both of these would be considered as ‘large scale’ processing.

2. Does the research project involve processing a large volume or wide range of personal data?

   E.g. Research that uses the entire medical record of a small number of individuals. This would be considered as ‘large scale’ processing. |
3. Will the research be carried out over a long period of time? Both of the examples below would be considered as ‘large scale’ processing.
   
   E.g. Research that will involve the collection of personal data every quarter for a period of three years.
   
   E.g. Research that where the data will need to be kept in an identifiable format for 10 years after the research has completed.

4. Does the research project involve processing of personal data across multiple (i.e. two or more) sites?

   If you are unsure or in doubt as to whether the research involves ‘large scale’ processing please consult with your supervisor and / or contact dataprotection@tcd.ie.