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 of 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.		
	Question	**Help Text**	**Guidance**
2.11.3.9	*Could the project result in automated decisions being made, (whether or not it includes profiling), or actions being taking against individual(s) in ways that could have a significant impact on them?*	See Guidance - please review carefully before answering.	Automated decision-making is the process of making a decision by automated means without any human involvement. It may overlap with or result from profiling. Automated decision making can be made with or without profiling, and profiling can take place without automated decision making. The GDPR does not just focus on the decisions made as a result of automated processing or profiling. It applies to the collection of data for the creation of profiles, as well as the application of those profiles to individuals. These decisions can be based on factual data, as well as on digitally created profiles or inferred data. Examples of this include: • an online decision to award a loan; and • an aptitude test used for recruitment which uses pre-programmed algorithms and criteria. Automated decision-making often involves profiling (as defined below) but it does not have to.

			E.g. An examination board uses an automated system to mark multiple choice exam answer sheets. The system is pre-programmed with the number of correct answers required to achieve pass and distinction marks. The scores are automatically attributed to the candidates based on the number of correct answers and the results are available online. This is an automated decision-making process that doesn't involve profiling. Although these techniques can be useful, there are potential risks: • Profiling is often invisible to individuals. • People might not expect their personal information to be used in this way. • People might not understand how the process works or how it can affect them. • The decisions taken may lead to significant adverse effects for some people. Just because analysis of the data finds a correlation doesn't mean that this is significant. As the process can only make an assumption about someone's behaviour or characteristics, there will always be a margin of error and a balancing exercise is needed to weigh up the risks of using the results. The GDPR provisions are designed to address these risks. Does your research project involve making decisions about individuals that would have a significant effect on the individuals, without the involvement or input of a human being? For instance, where the processing may lead to the exclusion or discrimination against individuals. **E.g.** Genomic research that will determine whether an individual is suitable for a particular treatment. **E.g.** Research that automatically generates profiles of individuals that would lead to their exclusion from a particular form of care. **NB** Processing with little or no effect on individuals does not match this specific criterion. 'Significant impact' means legal effects or similar. For example; in an employment context, e-recruiting practices without any human intervention, automatic refusal of an online credit application, any analysis or prediction of the individual's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements which can have a significant impact on the individual. Any research which uses automated decision making requires the explicit consent of the individual and the individual must at least have the right to request human intervention, to express their point of view and to contest any decision which affects them which is based on automated decision making. If you are unsure about whether your research involves automated decision making or profiling please consult with your supervisor and / or contact dataprotection@tcd.ie.