Data Protection Impact Assessment ('DPIA')

From the previous section it has been determined that the personal data you are collecting requires a Data Protection Impact Assessment ('DPIA').

'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.

The purpose of a DPIA is to assess and demonstrate compliance with data protection legislation.

The DPIA also provides evidence that the risks to individuals have been considered and sufficient measures have been taken to protect those individuals.

The DPIA assesses the activity to be carried out against all the principles of data protection and determine whether the processing of personal data is both necessary and proportionate or whether changes to the process or additional controls are required.

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 carefully.

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<th>Question</th>
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| 2.11.4.8 Purpose Limitation - Is the processing for the intended purpose only, or is there possibility that additional purposes may be added at a later date? | Use data for specified purposes only. | Under Article 5(1)(b) GDPR personal data should be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.  

The information collected should only be used for the purposes outlined in the study protocol, Participant Information Leaflets and Consent Forms, as approved by the Research Ethics Committee and the DPO’s Office. Any use of the information for a different purpose will require further Research Ethics and DPO approval as per the limitations of the written informed consent given by the participant/healthy control. There may also be implications for relevant data sharing agreements.  

Is the processing for the intended purpose only or is there possibility that additional purposes may be added at a later date? The context in which information is used or disclosed can change over time, leading to it being used for different purposes without participant’s knowledge. Researchers should ensure that consistency of purpose is maintained and that ‘function creep’ is avoided. Please provide detail on how purpose limitation will be preserved during your research study. |