## **DPIA Template**

The GDPR contains plenty of requirements, penalties, obligations, rights, and definitions, but it doesn’t contain a specific template for DPIAs, or data protection impact assessments.

If you’re struggling to identify exactly what your DPIA is supposed to contain, you can use this template (based on the Information Commissioner’s Office [ICO’s] template) to follow the basic steps. Please note that this template is just that—a template. DPIAs should be completed in coordination with an expert, such as a Data Protection officer (DPO). This template is not a replacement for a DPO’s expertise.

This template should be filled out whenever you begin planning a major project involving the use of personal data or when such a project or process is being changed in a significant way.

## Submitting Controller Details

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| --- | --- |
| Name of controller |  |
| Subject/title of DPO |  |
| Name of controller contact/DPO |  |

Step 1: Identify the Need for a DPIA

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| 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. Summarize why you identified the need for a DPIA. |
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Step 2: Describe the Processing

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| **Describe the nature of the processing: H**ow 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? |
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| **Describe the scope of the processing: W**hat 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? |
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| **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)? |
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| **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? |
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Step 3: Consultation Process

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| **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? |
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Step 4: Assess Necessity and Proportionality

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| **Describe compliance and proportionality measures, in particular:** What is your lawful basis for processing? Does the processing actually 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? |
|  |

Step 5: Identify and Assess Risks

|  |  |  |  |
| --- | --- | --- | --- |
| **Describe source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risksas necessary. | **Likelihood of harm** | **Severity of harm** | **Overall risk** |
|  | Remote, possible, or probable | Minimal, significant, or severe | Low, medium, or high |

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** |
|  |  | Eliminated, reduced, or accepted | Low, medium, or high | Yes/no |

Step 7: Sign Off and Record Outcomes

|  |  |  |
| --- | --- | --- |
| **Item** | **Name/position/date** | **Notes** |
| Measures approved by: |  | Integrate actions back into project plan, with date and responsibility for completion. |
| Residual risks approved by: |  | If accepting any residual high risk, consult your local data protection authority 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 be kept under review by: |  | The DPO should also review ongoing compliance with DPIA. |

Automate and Streamline the DPIA Workflow

Filling out a form according to these instructions is straightforward enough—but the reality of implementing them on a per-project basis is complex.

If you’ve made use of this template or considered how often you may need to make use of it, you’ve probably realized how difficult it will be to complete and maintain your DPIAs in an efficient and timely manner.

Effective compliance requires efficiency and timeliness, which is why DPOs and privacy professionals should look for a data privacy management platform with a built-in assessments module. In the Osano platform, you can:

* Assign stakeholders action items.
* Send automated reminders.
* Schedule regular review cadences.
* Review status of current assessments.
* Store and centralize assessments.

That’s not to mention the library of other assessment types and custom assessment functionality in Osano—or its suite of additional privacy solutions.

[Schedule a demo of the Osano Platform today!](https://www.osano.com/request/demo)