

**DPIA01 Form: Due Diligence Screening Tool**

The following screening questions will help our team decide whether a full data protection and privacy assessment is necessary. Your answers will provide an indication whether a full assessment must be undertaken.

<b>Q1</b>	<b>Project Title/Name</b>		
	Communications Preferences (part of the wider Hybrid Mail workstream (DPIA82))		

<b>Q2</b>	<b>Details of project lead</b>			
	<b>Name</b>	██████████	<b>Telephone</b>	██████████
	<b>Title</b>	Digital Delivery Manager	<b>Email address</b>	████████████████████
	<b>SBU</b>	Corporate	<b>Department</b>	IM&T

<b>Q3</b>	<b>Details of Information Asset Owner</b>			
	<b>Name</b>	██████████	<b>Telephone</b>	██████████
	<b>Title</b>	Head of Information, Business Intelligence & Systems Delivery	<b>Email address</b>	████████████████████
	<b>SBU</b>	Corporate	<b>Department</b>	IM&T

<b>Q4</b>	<b>Project outline</b>		
	<b>What is the estimated timeline for the project?</b>		
	This will be a short-term piece of work to support with the Hybrid Mail solution. It is anticipated that this work will be complete in no longer than 3 months <b>** (AR to agree timeframes)**</b>		
	<b>What are the full details and rationale of the project?</b>		
	Please include the project background and explain why the project has been initiated		
	<b>At present communication preferences are not robustly and easily stored on Paris. The proposal is to create a “communications preferences” section on Paris to enable efficient recording.</b>		
	<b>As part of the Hybrid Mail workstream, service users will receive automated appointment letters. In the first instance these will be received as a URL link that will be sent by SMS text message. If the link is not opened within 24 hours, the system will automatically send a physical copy of the letter in the post.</b>		
	<b>We need to ensure that preferences are recorded accurately so that we avoid data breaches and causing unnecessary harm to our service users (especially for those that do not wish to receive physical copies in the post).</b>		
	<b>It is proposed that once the communications preferences section has been developed on Paris, we as a Trust, will send SMS text messages to all our service users (except those that do not have a valid mobile number or have asked for no SMS to be sent in the past) and ask them their preferred method of communication (care and non-care). If possible, we would like an alert to be created automatically on Paris when the preference is recorded as no (i.e. do not post).</b>		
	<b>Once this has been completed, the expectation would be that the staff in the operational teams will be able to update as and when necessary and as new service users join the Trust.</b>		
<b>Describe the benefits, quality expectations and intended outcomes of the project</b>			
By instigating this in an automated fashion, some of the burden will be removed from staff in the first instance and will allow for some data cleanse work to be completed at the same time.			

Any service users who already have “do not text” selected, will be targeted via a separate piece of work (potentially email).
Describe the possible negative impact on data subjects, or the Trust from the intended project
At present, we don't foresee any negative impacts as in the long term, this will help our service users (and potentially carers) to only be contacted via the correct method.
What is the name of the system/application to be used? <small>Please give details of the internal and external (if applicable) IT stakeholder(s) involved</small>
Questlink (via Philips) – this system is already in place in the trust to record outcome measures.
Is the system/application used in any similar organisation? How are risks reduced/ mitigated?
Please see DPIA for the Questlink project for the risk mitigation that has already been undertaken.

<b>Q5</b>	<b>Data involved</b>																
	What data/information will be collected for this project and how will you collect it? <small>Compile the minimum data set required (e.g. Name, NHS Number, and Postcode etc.)</small>																
	The information will be collected via a form within Questlink. Service users will need confirm whether they are are happy to receive communications via the following methods for care and non-care:																
	<table border="1"> <thead> <tr> <th>Communication Type</th> <th>Care</th> <th>Non-care</th> <th>Neither</th> </tr> </thead> <tbody> <tr> <td>SMS Test Message</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Email</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Physical Post</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Communication Type	Care	Non-care	Neither	SMS Test Message				Email				Physical Post			
Communication Type	Care	Non-care	Neither														
SMS Test Message																	
Email																	
Physical Post																	
	Once collected, how will the data be stored?																
	The data will be stored on the service users Paris record																
	Will the data be shared with anyone?																
	No.																
	How will the data be extracted for Subject Access/Freedom of Information request purposes?																
	The same processes will be followed when extracting information from Paris for SARs.																
	What is the business continuity if the system becomes unavailable?																
	The usual Paris business continuity will be followed.																
	How will data subjects be informed about the use of their data for this project?																
	They will be contacted directly																

<b>Q6</b>	<b>Processing activities</b>		
	Does the project include any of the following activities? (tick as appropriate)		
Retrieval, obtaining, recording or holding information or data	<input checked="" type="checkbox"/>	Blocking, erasure or destruction of information or data	<input type="checkbox"/>
Alignment, matching, combining, organisation, adaptation or alteration of information or data	<input type="checkbox"/>	Disclosure or sharing of information or data	<input type="checkbox"/>
Consultation or use of information or data	<input type="checkbox"/>	Not applicable	<input type="checkbox"/>
	Do the project activities include any of the following data sets (Special Category)? (tick as appropriate)		
Personal identifiable details <small>(e.g. name, address, e-mail address, postcode, date of birth)</small>	<input checked="" type="checkbox"/>	Legal details <small>(e.g. legal documents or agreements, court papers)</small>	<input type="checkbox"/>
Identifier numbers <small>(e.g. NHS, national insurance, passport, driving license numbers)</small>	<input type="checkbox"/>	Cultural identity including racial or ethnic origin	<input type="checkbox"/>
Genetic data <small>(e.g. DNA, an individual's gene sequence)</small>	<input type="checkbox"/>	Political opinions, religious or philosophical beliefs	<input type="checkbox"/>
Biometric data <small>(e.g. fingerprints, facial recognition, retinal scans)</small>	<input type="checkbox"/>	Health data <small>(e.g. treatment, diagnosis, mental health information or condition)</small>	<input type="checkbox"/>
Family, lifestyle and social circumstances <small>(e.g. marital status, housing, travel, membership of charities)</small>	<input type="checkbox"/>	Location data <small>(e.g. GPS location, Wi-Fi tracking, vehicle tracking)</small>	<input type="checkbox"/>
Vulnerable individuals <small>(e.g. refer to safeguarding policies)</small>	<input type="checkbox"/>	Technology identifiers	<input type="checkbox"/>

		(e.g. device name, tools, protocols, IP address, cookie identifier)	
Education and training details (e.g. qualifications or certifications, training records)	<input type="checkbox"/>	Criminal proceedings (e.g. convictions, outcomes, sentences, offences or allegations)	<input type="checkbox"/>
Employment details (e.g. career history, recruitment and termination details)	<input type="checkbox"/>	Sexual life (e.g. sexual health, sex life or sexual orientation)	<input type="checkbox"/>
Financial details (e.g. banking, income, salary, assets, investments, payments)	<input type="checkbox"/>	Not applicable	<input type="checkbox"/>
Goods or services (e.g. contracts, licenses, agreements)	<input type="checkbox"/>		
<b>Does the project include any of the following activities?</b> (tick as appropriate)			
Evaluation or scoring, including profiling (e.g. credit scoring, fraud protection, questionnaire's that generate a profile to an individual)	<input type="checkbox"/>	Characteristic's which may affect an individual's legal rights or responsibilities ultimately preventing the exercise of their rights or contract	<input type="checkbox"/>
Automated decision-making (where a decision is taken without human intervention e.g. automated system, algorithms)	<input type="checkbox"/>	Implementation of a new technology, system or business process or collection of new information	<input type="checkbox"/>
Direct marketing (e.g. newsletters, postcards, telemarketing, e-mail subscriptions)	<input type="checkbox"/>	Change to existing technology, system or business process will significantly amend the way in which data or business is handled or used	<input type="checkbox"/>
Systematic monitoring of individuals (e.g. CCTV, body camera's, health data through wearable devices)	<input type="checkbox"/>	Use of a supplier	<input checked="" type="checkbox"/>
Storing or transferring data outside the EU (e.g. cloud computing, accessing data outside the EU, use of an American transcribe company)	<input type="checkbox"/>	Not applicable	<input type="checkbox"/>
Processing data on a larger scale (more than 11 individuals)	<input type="checkbox"/>		
<b>Is there any other information we need to be aware of in addition to the above?</b>			
Not applicable			

**Q7 Risk & Mitigation**

**At this stage, are there any risks to the Confidentiality of personal data?**  
(Confidentiality is defined as unauthorised disclosure of, or access to, personal data)

**We don't believe so – we are using the contact details we already hold for the service user**

**At this stage, are there any risks to the Integrity of personal data?**  
(Integrity is defined as unauthorised or accidental alteration of personal data)

**No.**

**At this stage, are there any risks to the Availability of personal data?**  
(Availability is defined as unauthorised or accidental loss of access to, or destruction of personal data)

**No.**

**At this stage, are there any known or immediate technical / IT / Information Security / Cyber Security concerns?**

**No.**

**If the answer to any of the above risk questions is “yes”, how are these going to be reduced or mitigated?**

**N/A.**

**Once the above risks are reduced or mitigated, how would you score any remaining risk using the below risk matrix?** (If you consider that there are no remaining risks give a value of 1 for both Likelihood and Severity)

Likelihood (please tick)			x	Severity (please tick)			=	2
1	<input checked="" type="checkbox"/>	Rare		1	<input type="checkbox"/>	Negligible		
2	<input type="checkbox"/>	Unlikely		2	<input checked="" type="checkbox"/>	Minor		
3	<input type="checkbox"/>	Possible		3	<input type="checkbox"/>	Moderate		
4	<input type="checkbox"/>	Likely		4	<input type="checkbox"/>	Major		

	5	<input type="checkbox"/>	Almost certain		5	<input type="checkbox"/>	Catastrophic		
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<b>Q8</b>	<b>In addition to the above questions already answered, are there any other details you think we need to be aware of?</b>
	None.

**Declaration**

This DPIA01 form and declaration must be completed and returned by email to the Information Governance Team at [hpft.infogov@nhs.net](mailto:hpft.infogov@nhs.net).

The responsible lead for the project will receive an confirmation e-mail; please note that the evaluation lead time for screening is five business working days.

Signed Declaration	
Project lead name	[REDACTED]
Project lead signed	[REDACTED]
Date Signed	16.09.2022

**For Information Governance Use only**

Outcome of Form		
Project Name	Click or tap here to enter text.	
Estimated completion date	Click or tap here to enter text.	
Does this project require a full DPIA? (tick as appropriate)	Yes - <b>Some</b> of the screening questions within this document apply to the above project; therefore, it is likely that a full Data Protection and Privacy Impact Assessment must be undertaken. I understand that at this stage the Data Protection Officer must be involved.	<input type="checkbox"/>
	No - <b>None</b> of the questions within this document apply to the above project; therefore I feel that it is not necessary to conduct a full Data Protection and Privacy Impact Assessment. This document will be held as a Due Diligence Form for the project	<input type="checkbox"/>
IG Team Owner Name	Click or tap here to enter text.	
IG Team Owner Signature	Click or tap here to enter text.	
Date Signed	Click or tap here to enter text.	
IG Comments	Click or tap here to enter text.	

Form No.	
Due Diligence No. (if applicable)	DPIA Click or tap here to enter text.
DPIA No. (for full DPIA use only)	DPIA Click or tap here to enter text.

**For Full DPIA Use Only**

In addition to this Due Diligence Screening Tool, please confirm which of the following forms have been sent to the Project Lead to be completed for this project:

Forms to be completed (tick as appropriate)			Date Sent
DPIA02	Supplier Requirements	<input type="checkbox"/>	Click or tap here to enter text.
DPIA03	Lawfulness of Processing	<input type="checkbox"/>	Click or tap here to enter text.
DPIA04	Data Quality	<input type="checkbox"/>	Click or tap here to enter text.
DPIA05	On-going Use of Data	<input type="checkbox"/>	Click or tap here to enter text.
DPIA06	Technical and Security Measures	<input type="checkbox"/>	Click or tap here to enter text.

DPIA07	Systematic Monitoring Decision Making and Profiling	<input type="checkbox"/>	Click or tap here to enter text.
DPIA08	Disclosure and Sharing	<input type="checkbox"/>	Click or tap here to enter text.