# UCL DATA IMPACT ASSESSMENT TEMPLATE FOR RESEARCH

| **Step 1 – DPIA team** | | | |
|---|---|---|---|
| | Name | Job Title | Email Address (as contact point for future privacy concerns) |
| Principal Investigator owning DPIA | Jed Stone | Leading Practition | http://questioningeducation.co.uk/contact/ |
| Third Part(y/ies) assisting with DPIA (if any) | - | - | - |
| **Step 2 – Research summary** | | | |
| Project Name | A critical realist theory of the project qualifications | | |
| Department /entity | UCL Institute of Education | | |
| Date | Original: 04.06.2019; updated: 28.06.2020 | | |
| **Step 3 – Identify the need for a DPIA** | | | |
| Describe the purpose/aims of the research. In your description set out the benefits to:<br>i. UCL<br>ii. individuals<br>iii. the wider public | Purpose: To extend knowledge and understanding of the project qualifications: the FPQ, HPQ, and EPQ. These are level 1, 2, and 3 qualifications respectively in the Regulated Qualifications Framework.<br><br>Aim: To construct a realist theory of the project qualifications, based mainly on the perspectives of learners and teachers at Riverside Academy. | | |
| Please explain:<br>- the role of personal data in the project;<br>- the risks to privacy there are in your project (please list), and<br>- why the processing of personal data is necessary and proportional for the purposes of your project. | Personal data: The data of pupils/alumni that will be processed comprise: forename, surname, school email address, age (on the day of consent/assent), gender, year group, project title, and grade(s) and mark(s) in the project qualifications. The data of staff that will be processed comprise: forename, surname, school email address, main subject taught, job title. The data of parents that will be processed comprise: forename, surname, email address, and child's name.<br><br>Risks to privacy: (a) Participants in group interviews could disclose what each other says. (b) Communication over school email is not confidential and might be monitored by the school. (c) An insider familiar with the school context or particular participants could infer | | |
| **Step 4 - Please describe the information flows. If this is described in another document, please attach it to this DPIA** | | | |
| Information Flows: means the collection, retention, use, transfer and deletion – i.e. all types of data processing as part of the project's lifecycle - of personal data should be described here. 'Transfers' would include emails between the team members. If information is sent outside the EU/EEA, you should state that here.<br><br>It would also be helpful to produce and refer to a flow diagram or another way of explaining data flows. | Please see data management plan, appended. | | |

# UCL DATA IMPACT ASSESSMENT TEMPLATE FOR RESEARCH

**Step 5 – What steps or controls are you taking to minimise risks to privacy?**

**Please tick**

| | | | |
|---|---|---|---|
| a. Risks to individual privacy are minimal | ✔ | j. Special category personal data is not used | ✔ |
| b. Personal data is pseudonymised | ✔ | k. Randomisation | |
| c. Encryption of data at rest, i.e. when stored | ✔ | l. Participant opt out at any stage of the research | ✔ |
| d. Encryption used in transfers | ✔ | | |
| e. Total number of participants is less than 50 | | m. Personal data kept in the EEA | ✔ |
| f. Information compliance training for staff has been completed - data protection, information security, FOI | | n. Research is not used to make decisions directly affecting individuals | |
| | | o. De-identification | ✔ |
| g. Hashing or salting employed | | p. Short retention limits | |
| h. Adherence to privacy by design principles | | q. Restricted access controls | |
| i. Probalistic risk management | | r. Other (please specify) | |

**Step 6 – What steps have you taken to make sure the research is as accurate as possible and there are minimal unintended consequences? Please tick**

| | | | |
|---|---|---|---|
| a. data management plan in place | ✔ | d. this study builds on a pilot study | |
| b. data management plan is peer reviewed | | e. an extension to a previous similar study registered by DPO, if there is, please provide the number | ✔ |
| c. PI experience levels - no experience; | | | ✔ |
| some experience; | ✔ | | ✔ |
| very experienced | | Z6364106/2019/06/37 | |

**Step 7 – How have you assessed what participants will think of the research? What have you done to address concerns raised? Please tick**

| a. pilot project | b. use of focus group | c. information sheet/consent form | d. experience drawn from previous study |
|---|---|---|---|
| | | ✔ | ✔ |

**Step 8 – For the controls/steps specified in Step 5, who will make sure the controls are put in place? Please tick**

| a. PI | b. Head of School | c. other body (please specify) |
|---|---|---|
| ✔ | | |