

## Data Protection Impact Assessment (DPIA)

Please complete all questions with as much detail as possible (liaising with partners/third parties) and then contact the IG Team prior to seeking approval.

### Section 1: System/Project General Details

<b>System/project/process (referred to thereafter as 'project') title:</b>	Integration of the new Aptan RESPOND database.	
<b>Objective:</b>	To capture and triangulate quality intelligence.	
<b>Detail:</b> Why is the new system/change in system required? Is there an approved business case?	The system will capture current intelligence which is currently held in various existing excel / word databases held within the secure y drive. The current data includes incidents, PAL's intelligence, complaints, serious incidents, compliments and concerns, some of which is patient identifiable. The Aptean RESPOND database will aim to bring all of these systems into 1 secure system with the aim of being able to store and triangulate the intelligence.	
<b>Stakeholders/Relationships /Partners:</b> Please outline the nature of such relationships and the corresponding roles of other organisations.	The CCG Quality team will be the custodian of the database with 8 licences for the quality team members who would need to input / access the information. North East Lincolnshire council also have the same system currently in use. The CCG quality team work in partnership with all Providers and consent is taken where patient identifiable data is to be collected.	
<b>Other related projects:</b>	Click here to enter text.	
<b>Project lead:</b>		
	Title:	Quality Assurance Lead NEL CCG
	Department:	Quality and Nursing
	Telephone:	0300 3000 570
<b>Information Asset Owner:</b> All information systems/assets must have an <a href="#">Information Asset Owner (IAO)</a> . IAO's should normally be a Head of Department/Service.		
	Title:	Quality Assurance Lead
	Department:	Quality and Nursing
	Telephone:	0300 3000 570
<b>Information Asset Administrator:</b> Information systems/assets may have an <a href="#">Information Asset Administrator (IAA)</a> who reports the IAO. IAA's are normally System Managers/Project Leads.	Name:	Click here to enter text.
	Title:	Click here to enter text.
	Department:	Click here to enter text.
	Telephone:	Click here to enter text.
	Email	Click here to enter text.

## Section 2: Data Protection Impact Assessment Key Questions

	Question	Response
<b>Data Items</b>		
1.	<p><b>Will the project use identifiable or potentially identifiable data in any way?</b></p> <p>If answered 'No' then a DPIA is not normally suggested.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, who will this data relate to:</p> <p><input checked="" type="checkbox"/> Patient</p> <p><input type="checkbox"/> Staff</p> <p><input type="checkbox"/> Other: <a href="#">Click here to enter text.</a></p>
2.	<p><b>Please state purpose for the processing of the data:</b></p> <p>For example, patient care, commissioning, research, audit, evaluation.</p>	<p>The identifiable data will include service users details who have either a PAL's enquiry that they wish to progress or alternatively they wish to progress a formal complaint against the CCG or from one of the services that the CCG commission. It is essential that when dealing with PAL's enquiries and complaints the names, addresses, contact details are collected and stored securely in order to be able to update service users on the complaint / enquiry in a timely manner.</p>
3.	<p><b>Please tick the data items that are held in the system</b></p> <p><b>Personal</b> }</p> <p><b>Special categories of personal data (sensitive data)</b> }</p>	<p><input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Address</p> <p><input checked="" type="checkbox"/> Post Code <input checked="" type="checkbox"/> Date of Birth</p> <p><input checked="" type="checkbox"/> GP Practice <input checked="" type="checkbox"/> Date of Death</p> <p><input checked="" type="checkbox"/> NHS Number <input type="checkbox"/> NI Number</p> <p><input type="checkbox"/> Passport Number <input type="checkbox"/> Pseudonymised Data</p> <p><input type="checkbox"/> Online Identifiers (e.g. IP Number, Mobile Device ID)</p> <p><input checked="" type="checkbox"/> Health Data <input type="checkbox"/> Trade Union membership</p> <p><input type="checkbox"/> Political opinions <input type="checkbox"/> Religion</p> <p><input type="checkbox"/> Racial or Ethnic Origin <input type="checkbox"/> Sex life and sexual orientation</p> <p><input type="checkbox"/> Biometric Data <input type="checkbox"/> Genetic Data</p> <p><input type="checkbox"/> Other:</p>
4.	<p><b>What consultation/checks have been made regarding the adequacy, relevance and necessity for the processing of the data for this project?</b></p>	<p>Consent is obtained and explanation to the service user about how that information is stored / processed. Periodic check are undertaken by myself as line manager.</p>
5.	<p><b>How will the data be kept up to date and checked for accuracy and completeness?</b></p>	<p>The data is reviewed on a daily basis by the staff who have the licence to input into the database. Periodic audit also takes place.</p>
<b>Data processing</b>		
6.	<p><b>Will a third party be processing data on the CCG or one of its contractors?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please go to the Confidentiality section.</p>

	Question	Response
7.	<p><b>Is the third party contract/supplier of the project registered with the Information Commissioner?</b></p> <p>This was required until 25 May 2018.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Organisation: Respond Group Ltd Data Protection Registration Number: ZA486389</p>
8.	<p><b>Has the third party supplier completed and published a satisfactory <a href="#">Data Security and Protection Toolkit submission</a>?</b></p> <p>Please note that the Data Security and Protection Toolkit replaced the IG Toolkit from 1 April 2018.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please give organisation code and percentage score: We have requested this is completed for 2019-20 as part of our contract.</p> <p><i>IG Toolkit Score:</i></p> <p><input type="checkbox"/> Satisfactory <input type="checkbox"/> Not satisfactory <input type="checkbox"/> Satisfactory with Improvement Plan</p> <p>If satisfactory with an improvement plan, please request a copy of the plan and enclose it with this assessment. If not satisfactory, please explain how the service has been procured: Click here to enter text.</p>
9.	<p><b>Does the third party/supplier contract(s) include all the necessary Information Governance clauses regarding Data Protection and Freedom of Information?</b></p> <p>See <a href="#">Contract and Commissioning Information Governance Assurance</a> checklist.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The contract includes appendix in relation data protection and GDPR. SIRO has agreed and signed the contract. Is the contract based on or utilise the NHS standard contract?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
10.	<p><b>Will other third parties (not already identified) have access to the data?</b></p> <p>Include any external organisations.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If so, for what purpose?</p> <p>Please list organisations and by what means of transfer:</p>
<b>Confidentiality</b>		
11.	<p><b>Please outline how individuals will be informed and kept informed about how their data will be processed.</b></p> <p>A copy of the <a href="#">privacy notice and/or leaflets</a> must be provided.</p>	<p>All complainants are made aware of the CCG privacy notice Consent has to be obtained for all complaints. An explanation always takes place to enable complainants to understand how that information is stored securely and only key members have access to the data. Sharing of individual patient identifiable does not take place.</p>

	Question	Response
12.	<p><b>Does the project involve the collection of data that may be unclear or intrusive?</b></p> <p>Are all data items clearly defined? Is the data collected limited to a specific set of predefined categories?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain: The data is personal details such as name, address etc to allow those providers to access the relevant amount of information in order to satisfy the questions raised in respect of a complaint, incident or PAL's enquiry.</p>
13.	<p><b>Are you relying on individuals (patients/staff) to explicit consent to the processing of personal identifiable or sensitive data?</b></p> <p>Please provide copies of any consent documentation that will be used, including patient information leaflets</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Go to next question)</p> <p>Consent: Implied (Direct Care) / GDPR Delivering and Managing Health and Social Care</p> <p>How will consent be obtained and by whom? Consent will be obtained in writing for formal complaints and for PAL's through verbal consent.</p> <p>Processing for complaints/incidents is necessary for the performance of a task carried out in the public interest or in the exercise of official authority. Statutory duty in public interest to investigate, manage and learn lessons under the patient safety umbrella</p> <p>Will the consent cover all proposed processing and sharing/disclosures? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please detail: <a href="#">Click here to enter text.</a></p>
14.	<p><b>If explicit consent is not being sought, what legal basis enables this data processing?</b></p> <p>For more information about conditions for processing, please see the <a href="#">ICO's GDPR website</a>.</p>	<p>Personal data (identifiers and potentially identifiable data):</p> <p><input type="checkbox"/> Relating to a contract: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Legal obligation: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Vital interests: <a href="#">Click here to enter text.</a>  <input checked="" type="checkbox"/> Public task: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Other: <a href="#">Click here to enter text.</a></p> <p>Special categories of personal data (sensitive data), <i>if applicable</i>:</p> <p><input checked="" type="checkbox"/> Medical related: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Public Health: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Employment related: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Vital interests: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Already public: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Legal claim related: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Substantial public interest: <a href="#">Click here to enter text.</a>  <input type="checkbox"/> Other: <a href="#">Click here to enter text.</a></p>

	Question	Response
15.	<p><b>Will identifiable data only be handled within the patients' direct care team (in accordance with the <a href="#">Common Law Duty of Confidentiality</a>)?</b></p>	<p><input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If no, please detail:            PALs and Complaints team will handle data as part of the public task legal basis and GDPR Article 6 &amp; 9. Explicit (healthcare) / GDPR Delivering and Managing Health and Social Care. The data held within this system is done so with the consent of the individual it relates to. The individual has provided consent and consenting to the identified purpose. The CCG will only use the identifiable information we collect to process the complaint and to check the level of service we provide. Where the complainant is not the patient, the CCG will usually need to disclose the complainant's identity to whoever the complaint is about in order to obtain consent under the Common Law Duty of Confidentiality to proceed with the complaint and for the complainant to correspond with us on behalf of the patient.</p>
16.	<p><b>How will consent, non-consent, objections or opt-outs be recorded and respected?</b></p>	<p>All consent / non-consent is recorded as well as objections</p>
17.	<p><b>What arrangements are in place to process Subject Access Requests?</b>            What would happen if such a request were made?</p>	<p>SAR's will be addressed as per the CCG's SAR policy</p>
18.	<p><b>Will the processing of data be automated?</b>            Will the proposed processing of data involved automated means of processing to determine an outcome for the individual?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Not applicable</p> <p>If yes, please outline what arrangements are available to enable the individual access and to extract data (in a standard file format). Please also detail any profiling that may take place as part through automated processing:  <a href="#">Click here to enter text.</a></p>
19.	<p><b>What process is in place for rectifying/blocking data?</b>            What would happen if such a request were made?</p>	<p>The CCG's SAR policy will be adhered too for processing of SAR requests.</p>
<b>Engagement</b>		
20.	<p><b>Has stakeholder engagement taken place?</b></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, how have any issues identified by stakeholders been considered?  <a href="#">Click here to enter text.</a>            If no, please outline any plans in the near future to seek stakeholder feedback:            There is no change to the process the only change is with the new database.</p>
<b>Data Sharing</b>		

	Question	Response
21.	<p><b>Does the project involve any new data sharing between stakeholder organisations?</b></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please describe: Click here to enter text. Please provide a high level data flow diagram showing how identifiable information would flow.</p>
<b>Data Linkage</b>		
22.	<p><b>Does the project involve linkage of personal data with data in other collections, or significant change in data linkages?</b></p> <p>The degree of concern is higher where data is transferred out of its original context (e.g. the sharing and merging of datasets can allow for a collection of a much wider set of information than needed and identifiers might be collected/linked which prevents personal data being kept anonymously)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide a data flow diagram showing how identifiable information would flow and ensure this is added to the CCG Information Asset and Data Flow Register (see Information Assets and Data Flows section).</p>
<b>Information Security</b>		
23.	<p><b>Who will have access to the data within the project?</b></p> <p>Please refer to roles/job titles/organisations.</p>	<p>Those who have access will be Quality Leads, Quality Manager, Incident Officer and the Customer Care Team (2 Pals / 2 complaints officers) all NEL CCG employed.</p>
24.	<p><b>Is there a useable audit trail in place for the project?</b></p> <p>For example, to identify who has accessed a record?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable</p> <p>If yes, please outline the audit plan: Comprehensive Access Logs and Auditing</p>
25.	<p><b>Where will the data be kept/stored/accessed?</b></p> <p>Where applicable, please refer to data flow diagram.</p>	<p>The data will be stored in RESPOND database which is cloud base. However, old data/closed complaints will remain on the ydrive until such time they have reached their destruction period, in line with the Records Management Code of Practice for Health and Social Care 2016</p>
26.	<p><b>Please indicate all methods in which data will be transferred</b></p>	<p><input type="checkbox"/> Fax <input type="checkbox"/> Email (Unsecure/Personal)  <input checked="" type="checkbox"/> Email (Secure/nhs.net) <input type="checkbox"/> Internet (unsecure – e.g. http)  <input checked="" type="checkbox"/> Telephone <input checked="" type="checkbox"/> Internet (secure – e.g. https)  <input type="checkbox"/> By hand <input type="checkbox"/> Courier  <input checked="" type="checkbox"/> Post – track/traceable <input type="checkbox"/> Post – normal  <input type="checkbox"/> Software <input type="checkbox"/> Mobile app  <input type="checkbox"/> Other: Click here to enter text.</p>

	Question	Response
27.	<p><b>Does the project involve privacy enhancing technologies?</b></p> <p><i>New forms of encryption, two factor authentication and/or pseudonymisation.</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please give details: <a href="#">Click here to enter text.</a></p>
28.	<p><b>Is there a documented System Level Security Policy (SLSP) or process for this project?</b></p> <p>A <a href="#">SLSP</a> is required for new <i>systems</i> – this is likely to need to be completed by the supplier.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Not applicable</p> <p>If yes, please provide a copy.</p>
<b>Privacy and Electronic Communications Regulations</b>		
29.	<p><b>Will the project involve the sending of unsolicited marketing messages electronically such as telephone, fax, email and text?</b></p> <p><a href="#">Please note that seeking to influence an individual is considered to be marketing.</a></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, what communications will be sent? <a href="#">Click here to enter text.</a></p> <p>Will consent be sought prior to this?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please explain why consent is not being sought first: <a href="#">Click here to enter text.</a></p>
<b>Records Management</b>		
30.	<p><b>What are the specific retention periods for this data?</b></p> <p>Please refer to the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> and list the retention period for identifiable project datasets.</p>	<p>In line with current guidance / legislation.</p>
31.	<p><b>Will the data be securely destroyed when it is no longer required?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please detail: <a href="#">Click here to enter text.</a></p>
<b>Information Assets and Data Flows</b>		

	Question	Response
32.	<p>Has an <a href="#">Information Asset Owner</a> been identified and does the <a href="#">Information Asset and Data Flow Register</a> require updating?</p> <p>Please see the <a href="#">Information Asset Register and Data Flow Mapping Form</a>.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, include the completed Information Asset Register New Entry Form.</p> <p>Does this project constitute a change to existing Information Asset(s) or is this a new Information Asset?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Will be a new asset - This will be added to the IAR/DFM if the CCG decide to go ahead with the database and replace the current systems on the IAR/DFM</p> <p>If yes, include the completed Information Asset Register and Data Flow Mapping Form for risk review.</p>
<b>Business Continuity</b>		
33.	<p>Have the business continuity requirements been considered?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Business Continuity is not applicable</p> <p>Please explain and either reference how such plans link with the organisational plan or why there are no business continuity considerations that are applicable for this project:</p> <p>As per the CCG business continuity plan and IT service provides IM&amp;T Disaster plan</p>
<b>Open Data</b>		
34.	<p>Will identifiable/potentially identifiable from the project be released as Open Data (placed in to the public domain)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please describe: <a href="#">Click here to enter text</a>.</p>
<b>Data Processing Outside of the UK and European Union (EU)</b>		
35.	<p>Will any personal and/or sensitive data be transferred to a country outside the UK?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, which data and to which country?</p>



**Section 3: Data Protection Impact Assessment Information Governance Review**

Information Governance Review (for completion by IG)			Response (for completion by project lead)	
Issue	Potential Risk	Recommendation	Agreed Action	Completion (Date and Initials)
1	<p><b>DPIA –Question 2</b></p> <p>The answer to this question does not make sense and does not detail the purpose for processing the personal identifiable data</p>	Lack of understanding of the purpose of the project	This is amended to detail what the implementation of Aptean respond database is.	Completed
2	<p><b>DPIA –Question 8 This has still not been completed</b></p> <p>The CCG has a responsibility to ensure that organisations from which services are commissioned assurance is obtained that they have appropriate IG Processes and procedures in place. Verifying the completion of the IG Toolkit (Data Security and Protection Toolkit(DSPT) post 31<sup>st</sup> March) is an appropriate way to obtain this assurance.</p>	The CCG being liable for breaches of the Data Protection Act by the service provider.	Verify that the providers of Aptean RESPOND have completed a data security and protection toolkit.	<p>No – Agreed for this to be completed within the next 3 months</p> <p>No risk as progressing to use RESPOND has been delayed until such time they can demonstrate compliance with DSPT.</p>

	All service providers to the NHS that provide services that process personal identifiable information, this includes storage must have completed a DSPT to and appropriate level				
3	<p><b>DPIA –Question 9</b></p> <p>The contract must include appropriate IG Clauses and this includes compliance with the DPA 2018, completion of a DSPT, dealing with subject access requests, information security, and indemnity clauses against breaches of the DPA caused by the service provider</p>	The CCG being liable for breaches of the Data Protection Act by the service provider.	The contract must be checked for inclusion of adequate IG Clauses before being signed		Completed
4	<p><b>DPIA –Question 13 &amp; 26</b></p> <p>It is noted that written consent is to be obtained from complainants to process and share their information with other organisations in order to be able to conduct investigations. However it is noted that verbal consent is being obtained in respect of PALS</p>	Lack of evidence of consent being obtained	<p>A process for recording consent for the PALS enquiries must be implemented and documented in records management procedures</p> <p>The agreed methodology of storing the written consents from complainants must</p>	The CCG have a records management policy and within this there is guidance/recommendation on creation and maintenance/ referencing of records structures. We do not have a procedure separate to records management policy for each service.	Completed

	enquiries, question 16 states this is recorded but it is not clear as to whether the process has been documented in records management procedures to guide staff.		also be implemented and documented in records management procedures	Everything will be documented with the RESPOND database.  Respond can be configured to automatically archive and/or delete cases and documentation if required although this is not currently part of the scope of the project. The CCG will look to ensure this is included as part of the project.	
5	<b>DPIA –Question 14</b> In order to process special category information legally the CCG must identify both an Article 6 basis as well as an Article 9 basis.	Unlawfully processing special category information	Add the Article 6 basis to the DPIA this is Public Task in this instance as the CCG is responsible for investigating complaints		Completed
6	<b>DPIA –Question 15</b> Is this correct what about the PALS and complaints team	Incorrect information recorded	This needs correcting		Completed
7	<b>DPIA –Question 25</b> Is this correct in my email query to you, you stated that the information is stored in cloud based storage.	Insufficient security controls being identified	This must be recorded correctly within the DPIA	Updated - The data will be stored in RESPOND database which is cloud base. However, old data/closed complaints will remain on the ydrive until such time they have reached there destruction period, in line with the Records Management Code of Practice for Health and Social Care 2016	Completed

8	<p><b>DPIA –Question 28</b></p> <p>A SLSP is required to detail controls in place to protect information within the system, to ensure only authorised staff are allocated access , prevent theft/loss of information and facilitate restore in the event of an outage.</p>	<p>Insufficient security controls being identified</p>	<p>An SLSP to be documented. NB/ a template document is available to facilitate this.</p>	<p>No SLSP has been completed, however we have identified and confirmed the list of security controls.</p> <p>The CCG currently have 7 licences. 2 of this are assigned super users access. The super users will be responsible for authorising/setting up of new user and maintain the users register.</p> <p>Access to the database is controlled using username and password. The system automatically requires the password to be changed every 30 days.</p> <p>Security breaches such as misuse of passwords/computer virus/ unauthorised access or any other breach will be reported as part of the CCG incident management process.</p> <p>Business Continuity/Disaster recovery.</p> <p>The IT support services shall be contacted for all support issues in the first instance to</p>	<p>Completed</p>

				<p>ensure that the fault does not reside locally. The system supplier is responsible for the support of the database itself</p> <p>The supplier is responsible for the disaster recovery arrangement for this hosted system. SaaS customer Aptean will be responsible for the disaster recovery of the Respond system.</p>	
9	<p><b>DPIA –Question 35</b></p> <p>It is unclear as to whether the place of storage is covered in the contract with Aptean RESPOND.</p>	Insufficient security controls being identified	The contract must include clauses that security this data and compliance with UK Data Protection Laws if stored outside the UK.	Updated – Aptean have confirmed data centres are based in the UK	Completed

For completion by IG:

	Residual Risk	Main Risk Sources	Main Threats	Main Potential Impacts	Main Controls Reducing the Severity and Likelihood	Severity	Likelihood
1							
2							
3							

IG review completed by:

Senior IG Specialist,

Review date:

April 2019

Date complete and risk assessed:

April 2019

Consultation with ICO required?

No

#### Section 4: Review and Approval

##### Assessment completed by

<b>Name:</b>	eMBED
<b>Title:</b>	Senior IG Specialist,
<b>Date:</b>	April 2019

##### Data Protection Officer Approval

<b>Name:</b>	Paul Ellis
<b>Title:</b>	DPO
<b>DPO advice:</b> DPO should advise on compliance, risks identified and whether processing can proceed. If accepting any residual high risk, consult the ICO before going ahead	APTEAN has yet to complete DSPT, it has been agreed as part of SOW to complete within the next 3 months  Based on an agreed timescale of 3 months from May 2019, and the scheduled training for user in mid-July 2019 it is likely that the commencement of the system using active data and the completion of the DS&PT will co-incide.  It has been agreed to mitigate any risk to the CCG to delay processing of any data through until evidence of a completed DS&PT is received, which also remove the need for an action would plan in the event of non-completion.
<b>Approved</b>	<input checked="" type="checkbox"/>
<b>Date:</b>	4 July 2019

The DPO should also review ongoing compliance with DPIA

##### SIRO/Caldicott Guardian Approval

<b>Name:</b>	Jan Haxby
<b>Title:</b>	SIRO
<b>DPO advice accepted or overruled:</b> If overruled, you must explain your reasons	Agreement, not to progress to using RESPOND until we are confident that Aptean have completed the DSPT and that they are required to demonstrate compliance with the DSPT on an annual basis
<b>Approved:</b>	<input checked="" type="checkbox"/>
<b>Date:</b>	5 July 2017

This DPIA will be kept under review by:	Quality Assurance Lead
---	------------------------