**Initial Data Risk Assessment (Research)**

If you are completing a research project that involves collecting or using personal data, you should complete this form. This will help ensure you have a proper data management plan in place, ensure you are complying with Data Protection legislation and will determine whether there are any risks in processing the personal data. If there are risks, you may need go on to the next stage and complete a full Data Protection Impact Assessment.

Before you start please read the [Data Management Planning Checklist](https://dmail.sharepoint.com/%3Aw%3A/s/ResearchServices/ETvJ71BbR6lHr_gCnu2OMm0BweYnaoXu9ILceNeLQ6DLJw?e=VcCkof&CT=1695310830728&OR=Outlook-Body&CID=10271766-90E3-45BD-983B-650A345E4D9E&wdLOR=cB5C841DF-0F26-4112-9D16-A7B0A828C831) and as you work through the table refer to the footnotes for further guidance. At the end of the form are links to other resources that will help you complete this form and put a robust data management process in place.

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| 1. **The Proposed Activities**
 | **Examples** |
| **Name / main contact** |  | *John Smith PhD student* |
| **Name of school or directorate**  |  | *School of Medicine* |
| **Description of your proposed activity or project** |  | *Research project to examine insomnia (add details)*  |
| **What type of personal data are you collecting /using / sharing?[[1]](#footnote-1)** |  | *Names of participants**Addresses**Emails**Ages etc* |
| **Why are you collecting this data?[[2]](#footnote-2)** |  | *Contact details required to keep in touch with participants**Age an integral part of project*  |
| **How are you collecting the data?** |  | *Using a University approved method: Teams interviews, Jisc survey* |
| **Where are you storing the data? Will it be secure?** |  | *On the School Sharepoint site, access restricted to members of the research project[[3]](#footnote-3)* |
| **How long will the data be kept?** |  | *Raw data will be kept for 10 years after the project is finished*  |
| **Are you sharing the data? Why and who with?**  |  | *With project partners (as part of the research) and with University approved transcription service providers.* |
| **How are you sharing the data?** |  | *Through SharePoint / OneDrive.*  |
| **Will the data be anonymised or pseudonymised? If so when?[[4]](#footnote-4)** |  | *Yes, any survey data submitted will be anonymous. Anonymisation will be carried out during transcription.* |
| **How will you inform the participants of all of this? How will you get their consent?** |  | *Yes, information and consent forms shared with participants* |
| **Any other parties involved?** |  | *Other than already set out above eg departments or third parties like NHS, Local authorities, Funders and/or Sub-processors* |

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| 1. **Risk Screening Questions**
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|  | **Y/N** |
|  | **Types of data** |  |
| 1 | Do the activities involve special category data?* personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs;
* trade-union membership;
* genetic data, biometric data (processed to identify a human being);
* health-related data;
* data concerning a person’s sex life or sexual orientation;
* data relating to criminal allegations / activity.
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| 2 | Do the activities involved data relating to children or vulnerable adults?[[5]](#footnote-5) |  |
|  | **Types of processing** |  |
| 3 | Do the activities involve the use of personal data without a privacy notice / participant information sheet being provided to the individual?  |  |
| 4 | Are you using non-University systems to collect, store, use or share the data? |  |
| 5 | Are you sharing the data outwith the University? |  |
| 6 | Do the activities involve systematic and extensive profiling or automated decision-making to make significant decisions about people?[[6]](#footnote-6) |  |
| 7 | Do the activities involve systematic monitoring of a publicly accessible place on a large scale? [[7]](#footnote-7) |  |
| 8 | Do the activities involve the use of new technologies? e.g., big data, artificial intelligence, and algorithms, as well as the Internet of Things, block-chain technology, facial recognition, new types of profiling, and 'deep fake' technology |  |
| 9 | Do the activities involve combining, comparing or matching personal data from multiple sources?  |  |
| 10 | Do the activities involve tracking individuals’ online or offline location or behaviour?  |  |
| 12 | Do the activities involve using data which could result in a risk of physical or mental harm in the event of a security breach or could there be a risk of harm to others by collecting the data?  |  |
| 13 |  Is this a major initiative for the University?  |  |

Please discuss this form with your supervisor / colleagues in your research project. If you are all satisfied that you have the correct data management processes in place as outlined in Part 1 and in the Data Protection Checklist and if you have answered no to all questions in Part 2 you are clear to proceed with your research. Please save this form as proof of your risk assessment.

If you or your supervisor / colleagues have concerns about your answers to Part 1 or have answered yes to any of the questions in Part 2 you may need to complete a full [Data Protection Impact Assessment](https://www.dundee.ac.uk/corporate-information/data-protection-template-research-projects) with the help of Information Governance to ensure the correct data management measures are in place to reduce any risk. You might find [this](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/) guidance on when to do a DPIA useful.

Please send this form to Information Governance at dataprotection@dundee.ac.uk if this is the case.

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| **DECLARATION – I HAVE COMPLETED THIS IDRA AND PROVIDED ANSWERS TO THE BEST OF MY KNOWLEDGE AND BELIEF**  |
| **Your details** | Name: Role: |
| **Date** |  |
| **Signature** |  |
| **Name of supervisor (if relevant)** |  |
| **Module number (if relevant)** |  |

**Further guidance**

Please email discovery@dundee.ac.uk if you have any questions about data management and more information can be found at <https://www.dundee.ac.uk/library/research/data-management>. You can find out more about the University’s approach to storing and sharing different kinds of data at <https://www.dundee.ac.uk/corporate-information/information-security-classification-scheme>.

**Revised January 2024**

1. Personal data is any information about an identifiable living individual. [↑](#footnote-ref-1)
2. Only collect the personal data that you really need for your project. [↑](#footnote-ref-2)
3. If you are researching with data held elsewhere please note this here but please complete the IDRA as we still need to ensure that your use (processing) of the data complies with UK GDPR. [↑](#footnote-ref-3)
4. Anonymised: any personal information is removed so you can no longer identify individuals eg aggregated or statistical data. Pseudonymised: data that can no longer be attributed to an individual without the use of data held separately. [↑](#footnote-ref-4)
5. Some Schools may work with these groups regularly and may already have processes in place to protect personal data of these individuals. Please note if this is the case. [↑](#footnote-ref-5)
6. This is likely to be using software to evaluate characteristics of people or to make decisions about them – if you are doing this extensively or in large numbers and using this information to make significant decisions about them choose yes. [↑](#footnote-ref-6)
7. Likely to be via CCTV or similar. [↑](#footnote-ref-7)