Step 1: Identify the Need for a DPIA
Explain broadly what the 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. Summarise why you identified the need for a DPIA.
Step 2: Describe the Processing
Describe the nature of the processing : how 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 another way of describing data flows. What types of processing identified as likely
high risk are involved?
Describe the scope of the processing : what 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?
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)?
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?

Step 3: Consultation Process

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 organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Step 4: Assess Necessity and Proportionality

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 minimisation? 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 the source of risk and nature	Likelihood of		Severity of		Overall Risk	
of potential impact on individuals.	Harm		Harm			
Include associated compliance and	•	Remote,	•	Minimal	•	Low
corporate risks as necessary.	•	Possible	•	Significant	•	Medium
	•	Probable	•	Severe	•	High

Step 6: Identify Measures to Reduce Risks

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5.

Risk	Options to	Effect on Risk	Residual Risk	Measure
	Reduce or	 Eliminated 	• Low	Approved
	Eliminate Risk	 Reduced 	 Medium 	
		 Accepted 	High	Yes/No

Item	Name and 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 the DPC before
		going ahead
DPO Advice Provided:		DPO should advise on
		compliance, step 6 measures
		and whether processing can
Summary of DPO advice:		proceed
DPO Advice		If overruled, you must explain
Accepted/Overruled by:		your reasons
Comments:		
Consultation responses		If your decision departs from
Consultation responses reviewed by:		If your decision departs from individuals' views, you must
•		
•		individuals' views, you must