



# Data Protection Impact Assessment (DPIA) – What is it and when does one have to be done?

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A Data Protection Impact Assessment (DPIA) is a way to help identify and reduce data protection risks in your diocese or parish. It must be done if you identify any risks when processing personal data.

These risks might include: the recording of people without their permission; using information that might endanger a person's physical health or safety if there was a data breach, or working on a project which involves collecting personal information on children or adults at risk.



**CCTV Example:** you install decide to install a CCTV camera system which overlooks a carpark; road; footpath; graveyard etc. you will need to carry out a DPIA. This CCTV camera system may be capturing individuals on camera without their knowledge, therefore breaching data protection guidelines.

A DPIA for your CCTV system would include the following:

- **Step 1:** Explain why you are installing CCTV (e.g. safety and security in the Public Interest) and the type of processing involved e.g. filming or recording
- **Step 2:** Describe how you will collect, use, store, share and delete the data. Images are personal data, like name, address, phone number. They need to be treated the same way. Images may also be requested as part of a Subject Access Request. .
- **Step 3:** Consider how you will involve the members of your diocese or parish and explain this project to them; is there anyone else you need to consult? (E.g. Bishop, RCB, information security experts).
- **Step 4:** Identify and assess any possible risks. For example, do people know that CCTV cameras are recording them? Are your cameras capturing any public footpaths; playgrounds; School yards?; plan how will you answer a Subject Access Request for images (remembering you can't share images of other people without consent).
- **Step 5:** Identify and implement ways to avoid the risks. E.g. Move camera angles; put clear notices explaining that CCTV is being used, why it is being used and where the cameras view.
- **Step 6:** Sign off (Bishop; Diocesan Council, Select Vestry for example) and record the outcomes of your assessment
- **Step 7:** Carry out regular reviews on your DPIA – every year check that nothing has changed. If it has, update your DPIA.

For a DPIA template and more information, please visit the Parish Resources section of the Church of Ireland website