



Data Protection Impact Assessment: List of Requirements

Before submitting your DPIA template to the DP Office, please ensure that you have completed and addressed all relevant points below. **The DP Office will not review your DPIA unless you can demonstrate engagement with or reference to the checklist and its attending documents and requirements.**

Are your data [anonymous](#)?

Yes ☐

No ☒

If you are claiming that your data are **anonymous**, are there any potential data linkages that would allow someone to identify your data subjects? Note that simply removing a name does not constitute anonymisation. Have you considered the impact of other potential identifiers e.g. you are studying individuals with an uncommon medical condition and also working with gender, age, and location data or other factors that narrow your population and potentially lead to identification?

Are your data [pseudonymous](#)?

Yes ☐

No ☒

If you hold an identifier key(s) that would allow you or another party to identify your masked data then it is pseudonymous and therefore must be treated as personal data.

Is the University a [data controller or a data processor](#) for this project?

Data controller ☒

Data processor ☐

Will you require third parties (outwith UofG) to assist you in gathering, storing, accessing, or translating or transcribing the data?

Yes ☒

Explain: We will collect survey data using JISC Online Surveys. The survey tool is approved by the University of Glasgow for online survey data collection.

No ☐

Do you have a [data sharing agreement](#) in place?

N/A

If you do not have an agreement, but you require one, complete the [Questionnaire for Data Processing Involving Third Parties](#) and return to the [Contracts Team](#).

Have you completed a [privacy notice](#) to inform data subjects on the intended use of their personal data? (If you answer “yes”, please attach for review.)

Yes ☒

No ☐

Have you completed the University's online [Data Protection](#) and/or [Information Security](#) trainings? (These trainings are mandatory for all staff; the full project team should complete both training modules)

Yes ☒

If yes, please indicate dates of completion for all colleagues:

Researcher	Data Protection	Information Security
Dr Jonathan Olsen	12/07/2019	12/07/2019
Ms Jessica Hepburn	04/05/2022	09/05/2022
Ms Gillian Bell	17/07/2019	16/07/2019

Have you completed a [research data management plan](#) and reviewed the [DMP and DPIA Workflow chart](#)?

Yes ☒

No ☐

If no, please explain why you do not require a data management plan.

Have you applied for, or received ethical approval?

Yes ☒

If yes, when was the application submitted? Approved? Please submit a copy with this DPIA submission.

No ☐

Consider the following ways to reduce potential risk and demonstrate practical compliance:

- pseudonymisation
- [data minimisation](#)
- storage limitation
- access restrictions
- detailed data flow modelling
- technical solutions (e.g. encryption)
- organisational measures (e.g. policies, procedures and workflows to comply with GDPR requirements)

Project overview	
Project Name:	The 20 minute neighbourhood: interactive map and survey of local facilities within a 20-minute return walk of home.
Brief description of the Project:	<p>The first purpose of the research is to share information with young people to learn about Scotland's planning policy for the next 5-years, specifically the local area focus that aims to provide access to a number of important destinations within a 10-minute walk of a residential location.</p> <p>The second purpose of the research is to collect data from young people using an online survey tool regarding how they would rate their local area and what destinations they would like within their local areas to meet their daily needs, based around the Scottish Government's Place Standard for Young People.</p>
Project Owner (PI): Name, Designation and email address	<p>Dr Jonathan Olsen Research Fellow, MRC/CSO Social and Public Health Sciences Unit. Jonathan.olsen@glasgow.ac.uk</p>
Project Manager (Co-I): Name, Designation and email address	<p>Dr Jonathan Olsen Research Fellow, MRC/CSO Social and Public Health Sciences Unit. Jonathan.olsen@glasgow.ac.uk</p>
External project partners, if any:	No external project partners related to this DPIA.
Summarise identified need for DPIA:	<p>Although no sensitive information will be collected, the views of human participants will be collected relating to their local area. The participants will provide information such as their gender, age and postcode.</p> <p>The data will be collected using JISC Online Surveys (approved by the University of Glasgow, GDPR compliant and certified to ISO 27001 standard.).</p>
Timing of the Project: Start/end dates, duration as applicable	The research will align with the 2022 Festival of Social Sciences and take place from Saturday 22 October to Sunday 13 November 2022.
Date template completed:	05/07/2022

Date submitted to the Data Protection Office:

Describe the processing activities

Describe the nature and purpose of the processing:

You might find it useful to refer to a flow diagram or another way of describing data flows.

Online Survey:

The survey will be administered using JISC Online Surveys, the University of Glasgow approved and recommended online data collection tool.

Data storage

Data management plan has been developed in line with the current SPHSU standard operating procedures (SOP) for research using personal data. The SPHSU has separate secure drives to keep personal (Q drive) and study data (T drive) apart. Raw workshop audio and video recordings along with raw transcripts will be stored on the secure T drive in a subfolder labelled 'Confidential Data.' Access to this folder will only be granted to Dr Olsen and Ms Hepburn. Identifying data will never be printed. We will endeavour not to have printed copies of data, however, should such data be created, it will be stored in a locked cabinet at the SPHSU until it can be converted to digital format. The paper copies will then be securely destroyed.

Project folders on both drives are only accessible to members of the SPHSU research team, who access the drives via password and VPN, when not physically at the Unit. Access to the secure Q drive with personal data will be restricted only to key members of the research team (i.e. PI and Co-Is) and any additional access only granted for a specified reason (i.e. data validation and study audit), and upon completion of a data privacy access log to record who obtained access to the personal information.

After the analyses are completed, research data will be archived with the UK Data Service or a similar secure repository and retained for the minimum of 10 years, in line with the current University advice

(https://www.gla.ac.uk/myglasgow/datamanagement/storageandcosts/#what_about_create).

Describe the scope and context of the processing:

What is the nature of the data, and does it include special category or criminal offence data?

The data includes the following special category data:

- Personal data: gender, age and postcode.

How many individuals are affected by your planned processing?

The project will have unlimited scope upto 10,000 participants recruited across the SHINE research network. However, it is unlikely we will reach these numbers and we envisage approximately 100 individuals will complete the survey.

What is the nature of your relationship with the individuals whose data you will process?

Professional relationship between researcher seeking the views from participants about their local area. The data will be collected online and we do not anticipate verbal or electronic communication unless further information is requested.

How much control will they have over what you do with their data?

Participants are free to withdraw from the study at any point. If they do decide to withdraw, they will be reminded that, as per their signed participant consent form, any of their data collected up to the point of withdrawal will be retained for the purposes of the research project. However, if data analysis has not yet commenced, the participant may request that their questionnaire data be removed. Once analysis has commenced, data cannot be withdrawn. The process is justified in accordance with the General Data Protection Regulations. Research into public health is a 'public task' which requires the retention and processing of data.

Does your processing include children or other vulnerable groups?

Yes, young people aged 11 to 18.

What geographical area does it cover?

Scotland.

Are there concerns over this type of processing generally or more specifically regarding information security ?

No, we are using standard and secure data collection methods for non-sensitive data.

Does the project involve the use or development of new technology?

No.

Are there any current issues of public concern that you should factor in?

No, we seeking the views from young people about their local area.

Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

N/A.

Ensuring basic compliance

Describe how you will uphold the [data protection principles](#):

What is your [lawful basis for processing](#)?

The Legal Basis for this research is GDPR Article 6(1)(e) Processing is necessary for the performance of a task carried out in the public interest; and for special category Article 9(2)(j) Processing is necessary for archiving purposes in the public interest, or scientific and historical research.

What information will you give to individuals about the project

Participants will be provided with an information participant sheet and privacy notice.

How will you help to support their rights?

A Participant Information Sheet will be provided to study participants. It will inform them of the purpose of the study and what to expect during the study. Participants will be informed that their data will be de-identified to preserve anonymity as far as possible. It will inform them of their right to withdraw from the study if they wish, however their data up to that point will still be used.

How will you prevent function creep?

Function creep will be avoided by the use of a pre-specified online survey that will be approved by the ethics committee. The survey will be disseminated via channels specified in the ethics application only. Data will be used to answer the research questions.

How will you ensure data quality and [data minimisation](#)?

The data processors are the PI and Co-Is, bound by the good practice guidelines of the SPHSU and the University of Glasgow.

How will the data be kept up-to-date, if necessary?

N/A.

How long will you [keep the data](#)?

After the analyses are completed, research data will be archived with the UK Data Service or a similar secure repository and retained for the minimum of 10 years, in line with the current University advice (https://www.gla.ac.uk/myglasgow/datamanagement/storageandcosts/#what_about_create).

How will the retention be reinforced?

The data processors are the PI and Co-Is, bound by the good practice guidelines of the SPHSU and the University of Glasgow.

How will the data be kept securely, both during the project and after completion?

Data management plan has been developed in line with the current SPHSU standard operating procedures (SOP) for research using personal data. The SPHSU has separate secure drives to keep personal (Q drive) and study data (T drive) apart. Raw workshop audio and video recordings along with raw transcripts will be stored on the secure T drive in a subfolder labelled 'Confidential Data.' Access to this folder will only be granted to Dr Olsen and Dr Hepburn. Identifying data will never be printed. We will endeavour not to have printed copies of data, however, should such data be created, it will be stored in a locked cabinet at the SPHSU until it can be converted to digital format. The paper copies will then be securely destroyed.

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Will you be sharing data internationally?

No.

Identify and assess risks and measures to reduce risk

Describe the source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm + (Remote, possible or probable)	Severity of harm = (Minimal, significant or severe)	Overall risk (Low, medium or high)	Options to reduce or eliminate risk	Residual risk <i>(after reduction)</i> (Low, medium or high)
<i>Deductive disclosure of participant identity.</i>	<i>Possible</i>	<i>Significant</i>	<i>Low</i>	<i>Data will be de-identified. Data will be stored on the Q drive. Access to data on the Q drive will be limited to the PI and Co-I's.</i>	<i>Low</i>

Data Protection & FOI Office recommendations

DP & FOI Office advice provided:		DP & FOI Office should advise on compliance and step 6 measures
Summary of DP & FOI advice:		

Sign off and record outcomes (To be completed by the PI/Project Lead)

Mitigation measures and residual risks approved by <i>(sign & date)</i> :	Notes: <ul style="list-style-type: none"> All mitigation measures must be integrated back into the project, with a documented date and responsibility for completion. The ICO must be consulted if high risks are identified and cannot be mitigated. If the DP & FOI Office advice is overruled, an explanation must be provided.

This DPIA will be kept under review by:		A copy of the most recent version should be sent to the DP & FOI Office and retained in the IAR* by the PI/Project Lead.

* The University's Information Asset Register (IAR) is a repository for all data protection compliance documents, e.g. privacy notices, DPIAs etc. You can access the IAR (using VPN or remote staff desktop) here: <https://www.gla.ac.uk/myglasgow/dpfoioffice/gdpr/onlineinformationassetregister/>.

Note: students don't have full access to the IAR so DPIAs for student research projects and theses should be uploaded by the supervisor instead