

## DPIA PROCEDURES

Version 4	June 2022
Agreed by SMT	June 2022
Review date	June 2024

## 1. Introduction

- 1.1 These Procedures set out the manner in which Age UK East London, a Private Limited Company by guarantee without share capital use of 'Limited' exemption registered in England under number 07687015, whose registered office is at 2nd Floor 82 Russia Lane, Bethnal Green, London, England, E2 9LU ("the Company") assesses the need for and conducts Data Protection Impact Assessments (DPIAs).

## 2. Scope

- 2.1 These Procedures expands on the requirements in the Company's Data Security and Protection Policy that:
  - a) The Company shall carry out Data Protection Impact Assessment (DPIA) Threshold Assessments for all new programmes, projects, procedures or products ('Programmes') that will or could possibly involve the processing of personal data.
  - b) Assessments may be carried out by the completion of online forms.
  - c) The Assessments will be checked and approved by the Company's Data Protection Officer ("DPO").
  - d) The Company shall carry out full DPIAs for any and all new Programmes and/or new uses of Personal Data which involve the use of new technologies and where the Processing involved is likely to result in a high risk to the rights and freedoms of Data Subjects.
- 2.2 All Procedures set out in this document must be followed at all times by the Company, its employees, agents, contractors, volunteers and other parties working on its behalf in all locations.

## 3. Policy framework

- 3.1 These Procedures are part of the Company's Data Security and Protection Framework.
- 3.2 These Procedures should be interpreted in conjunction with the Company's primary policy in the framework, the Data Security and Protection Policy.
- 3.3 Definitions and abbreviations contained in the Data Security and Protection Policy apply equally to this Policy.

## 4. Responsibilities

- 4.1 The Company's **Senior Information Risk Owner** (SIRO) is responsible for ensuring that:
  - a) these Procedures are followed by the Company and in particular that;
  - b) DPIA Threshold Assessments are carried out for all new programmes, projects, procedures and products introduced by the Company;
  - c) DPIAs are undertaken where required or advised by the Information Commissioner (ICO) or the Company's Data Protection Officer (DPO and

- d) that requirements and actions arising out of DPIA Threshold Assessments and DPIAs are enacted and followed by the Company.

4.2 The **Company's Data Protection Officer** (DPO) is responsible for:

- a) providing advice and guidance to the Company on the implementation of these and related Procedures
- b) reviewing these Procedures regularly to ensure that they comply with current Data Protection Law and best practice
- c) evaluating DPIA Threshold Assessments submitted by the Company
- d) assisting the Company with the completion of DPIAs
- e) liaising with the Information Commissioner (ICO) where required and as necessary
- f) reporting back to the Company with findings, advice and actions required as a result of DPIA Threshold Assessments and DPIAs completed by the Company

## **5. Procedures**

### **5.1 DPIA Threshold Assessment**

- a) The steps detailed in Appendix A and B must be followed for all new programmes, projects, procedures, products and other arrangements, commissioned or undertaken by the Company, that could process Personal Data.

### **5.2 DPIA**


- a) The steps detailed in Appendix A and C must be followed whenever the ICO, Company Senior Management or DPO require a DPIA to be completed for a programme, project, procedure, product or other arrangement, commissioned or undertaken by the Company.

## **6. Implementation and review**

- 6.1 These Procedures shall be deemed effective as of 27th June 2022. No part of this document shall have retroactive effect and shall thus apply only to matters occurring on or after this date.
- 6.2 This document will be reviewed regularly and normally at least annually.
- 6.3 This document will be updated as necessary to reflect current best practice.
- 6.4 The latest version of this document will be made readily available to all Staff and other relevant parties.

## 7. Approval

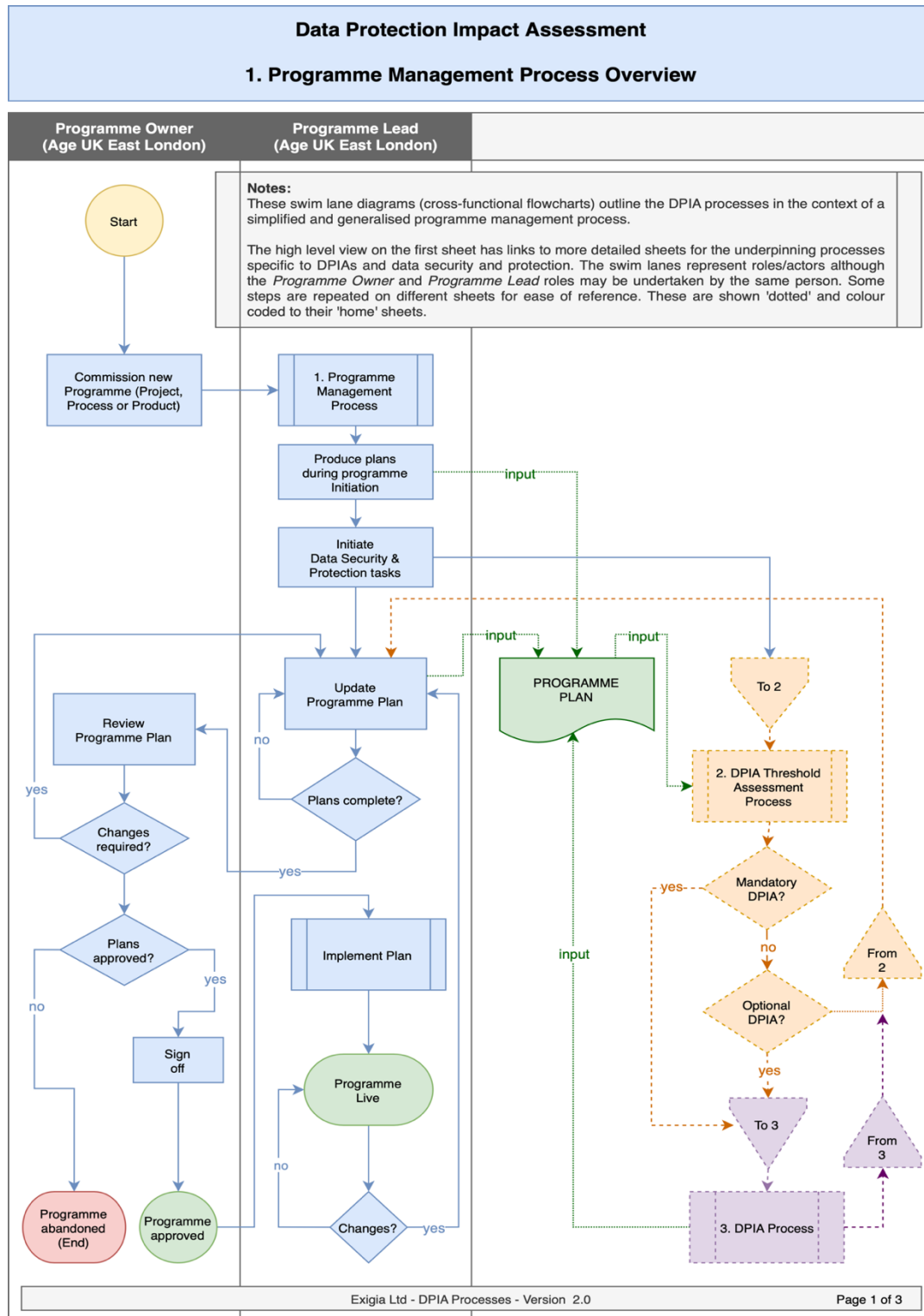
This document has been approved and authorised by:

<b>Name:</b>	Geetha Umaasuthan
<b>Position:</b>	Director of Finance and Operations
<b>Date:</b>	27/6/2022
<b>Due for Review by:</b>	26/06/2024
<b>Signature:</b>	

## 8. Change history

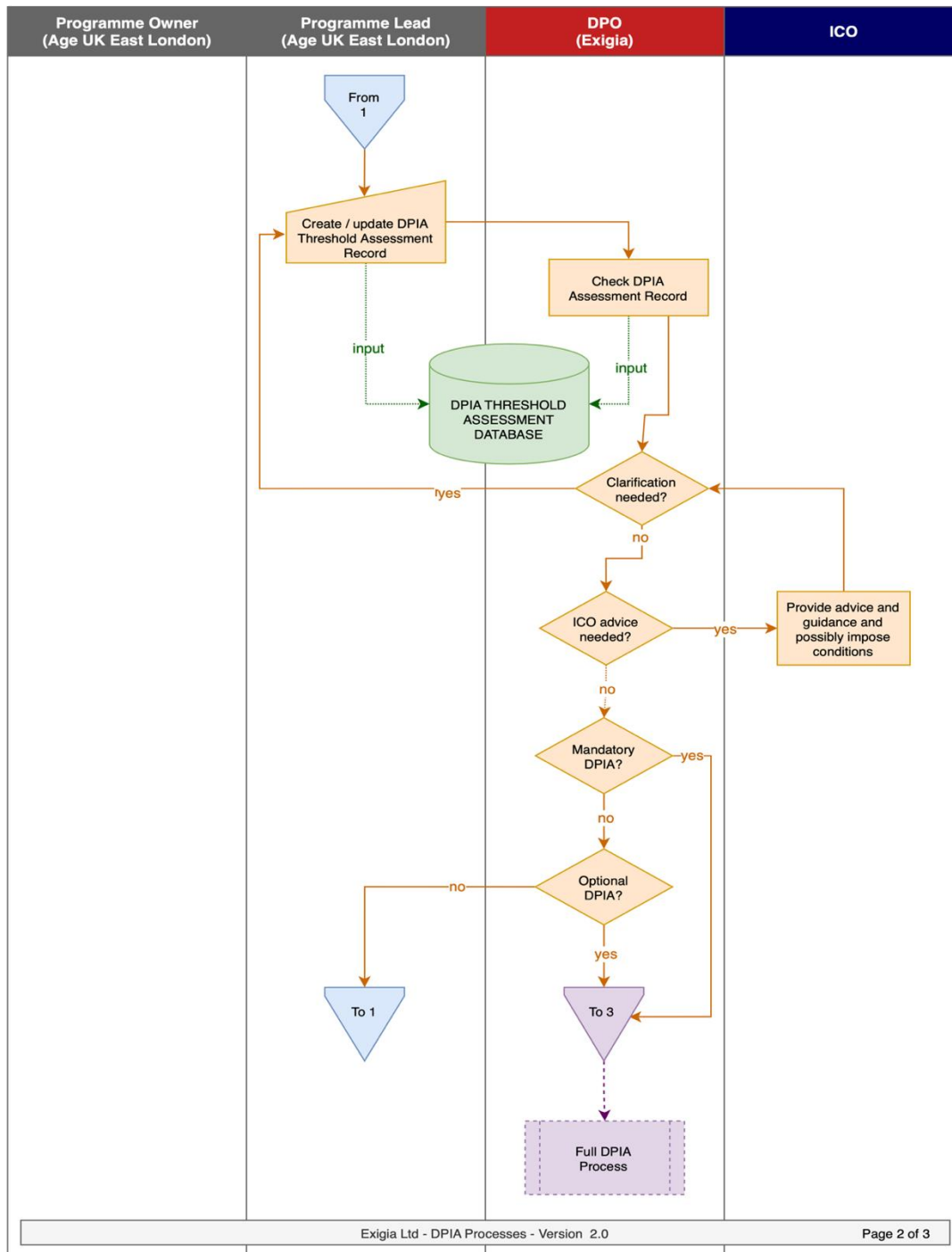
Version	Section	Issue	Change	Approval	Date
4.0	All remaining	Review	Minor	DPO	24/06/2022
4.0	2.1	Clarification	Further detail added	DPO	24/06/2022
3.0	All	New Data Security and Protection Framework	Multiple		

# Appendix A: Programme Management Process Overview



# Appendix B: DPIA Threshold Assessment Procedure

**Data Protection Impact Assessment**  
**2. DPIA Threshold Assessment Process**



**Appendix C: DPIA Procedure**

# Data Protection Impact Assessment

## 3. DPIA Process

