

UCL DATA IMPACT ASSESSMENT FOR RESEARCH

Step 1 – DPIA team			
	Name	Job Title	Email Address (as contact point for future privacy concerns)
Principal Investigator owning DPIA	Paul Longley	Director Consumer Data Research Centre; Professor of Geographic Information Science	p.longley [at] ucl.ac.uk
Third Part(y/ies) assisting with DPIA (if any)	University of Liverpool		
Step 2 – Research summary			
Project Name	Consumer Data Research Centre (CDRC-ULO)		
Department /entity	Geography		
Date	Applicable from 14 February 2014, DPIA updated 5 December 2022		
Step 3 – Identify the need for a DPIA			
<p>Describe the purpose/aims of the research. In your description set out the benefits to:</p> <ul style="list-style-type: none"> i. UCL ii. individuals iii. the wider public 	<p>Since 2014 the Consumer Data Research Centre based at University College London and the Universities of Liverpool and Oxford (henceforth CDRC-ULO) has been a leading international centre for the acquisition, analysis and provisioning of consumer and business data to the UK research community. The Centre was funded by the Economic and Social Research Council (ESRC) to deliver a comprehensive and internationally leading data service to external users</p> <p>The CDRC-ULO service continues to deliver against ESRC’s national priorities and needs for the social sciences by facilitating unique and cutting-edge research. UCL has benefited from this process both in terms of the capability and capacity which the University can offer in this research area, and with regard the credibility which has been developed as a platform for future data-related research proposals</p> <p>In relation to individuals, CDRC-ULO has supported many thousands users through our public data portals and Trusted Research Environments (TREs), with continued growth rates for both Controlled/Safeguarded data and Open data). We aim to sustain this performance during the transition to the DigitalFootprints Data Service.</p> <p>There have been several examples of contributions made by CDRC-ULO to the wider national community. One such instance is that of the Ethnicity Estimator tool (ee.cdrc.ac.uk) developed in partnership with the Office for National Statistics (ONS), which was used by Public Health Wales to examine ethnic variations in outcomes for patients hospitalised in the early stages of the Covid-19 pandemic.</p>		

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<p>Please explain:</p> <ul style="list-style-type: none"> - the role of personal data in the project; - the risks to privacy there are in your project (please list), and - why the processing of personal data is necessary and proportional for the purposes of your project. 	<ul style="list-style-type: none"> - The CDRC-ULO service provides anonymized aggregate data for research purposes. - The data are held in facilities certified to ISO 27001 standards, but there could still be a risk to privacy if any part of these facilities were to fail. - Personal data, in agglomerated and anonymized forms, are used where necessary to support projects which contribute to the wider public good, whilst conforming to GDPR regulations.
<p>Step 4 - Please describe the information flows. If this is described in another document, please attach it to this DPIA please refer to the guidance at pages 2-3 above to explain what details should be included.</p>	
<p>Information Flows: means the collection, retention, use, transfer and deletion – i.e. all types of data processing as part of the project’s lifecycle - of personal data should be described here. ‘Transfers’ would include emails between the team members. If information is sent outside the EU/EEA, you should state that here.</p> <p>It would also be helpful to produce and refer to a flow diagram or another way of explaining data flows.</p>	<p>The <u>Consumer Data Research Centre</u> is the UK's leading source of consumer data, part of the ESRC's Big Data Programme. We offer data under three tiers: Open, Safeguarded and Secure. Access to Safeguarded/Secure data is through a reviewed application process. Secure data is accessed through our labs in London and Liverpool, or remotely through UCL's Data Safe Haven. The details of each Service are provided in the <u>CDRC Data User Guide at https://data.cdrc.ac.uk/sites/default/files/D11%20CDRC%20Data%20User%20Guide.pdf</u>, which includes a diagram of the data flows.</p> <p>To download our Open datasets, and to apply for Safeguarded/Secure datasets, we ask users to create an account on CDRC Data. This allows us to better understand the impact of our research, and aggregated user statistics are part of our funder's reporting requirements.</p> <p>Information may be sent outside the EU/EEA if the customer concerned requires that this should be done.</p>

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Step 5 – International Data Transfer		
Consideration	Answer	Guidance notes
Is the data being transferred outside the UK or EEA?	Yes, though only in an anonymized and disaggregated form.	As set out above, all data transfers outside the UK/EEA now carry some risk. It is important to ensure that appropriate technical measures are in place to protect the data, such as encryption. You should explain where personal data is being transferred to.
Will SCCs be put in place to cover the data transfer in questions?	No	It is strongly recommended that SCCs are in place for all international data transfers although they do not eradicate all risk as outlined above.
Does the data transfer require a new contract?	No	Continuation of existing contracts is considered a lower risk while we await further guidance on the impact of the CJEU judgment.
What awareness will the data subject have of the specific data transfer?	None	Greater awareness could mean a lower risk that a data subject may object to the transfer.
What benefits does the data subject get from the processing that involves the data transfer?	None	A free service providing significant benefits to the data subject may have less risk of complaint than a data transfer that is done purely for UCL's benefit.
What personal data is included in the transfer?	None	Transfer of special category data may carry greater risk.
Is the processing/transfer in an area that has seen ICO enforcement?	Not as far as is known	The ICO follow a risk-based enforcement policy. Their assessment of risk can be inferred from historic enforcement activity. In particular you should consult the DPO if your proposed processing activities involve international transfer in relation to unsolicited marketing, data scraping or includes information that might be of interest to intelligence services.

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Is the data transfer unique to UCL or part of common service?	Yes (UCL Dropbox / UCL DSH File Transfer Service)	Data transfers deriving from use of popular/widespread services may carry less risk that a complaint would be made to UCL specifically.
Does the processing / data transfer help adherence to other data protection requirements?	Yes	For example, a project to standardise UCL activity with one selected supplier would carry considerable benefits for data accuracy, data minimisation, purpose limitation etc. These benefits may partially mitigate the risks associated with a transfer.
Does the third party demonstrate a decent level of GDPR compliance?	Yes – the University of Liverpool operates to strict GDPR compliance standards	For example, do they still rely on the Privacy Shield, do they explain how they comply with the GDPR?
Conclusion: Based on the above risk assessment, please explain why you believe any risks of international transfer have been mitigated for this research study.	Data requests are reviewed by CDRC-ULO's Research Approval Group (RAG) which provides independent and transparent assessments of applications by researchers for access to data through both the CDRC Safeguarded and CDRC Secure services. Approval will not be granted without evidence that the applicant has obtained or is seeking ethical approval for the research through their institution, or has supplied justification that these are not applicable. For non-academic projects, these requirements will be assessed by the CDRC institution at which the data will be accessed and analysed.	Please use this box to summarise your review of the data transfer risks and how you have mitigated them.

If you do not think you can mitigate the risk, this matter must be escalated to the Data Protection Officer.

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Step 6 – What steps or controls are you taking to minimise risks to privacy?

Please tick

a. Risks to individual privacy are minimal	<input checked="" type="checkbox"/>	j. Special category personal data is not used	<input type="checkbox"/>
b. Personal data is pseudonymised	<input type="checkbox"/>	k. Randomisation	<input type="checkbox"/>
c. Encryption of data at rest, i.e. when stored	<input checked="" type="checkbox"/>	l. Participant opt out at any stage of the	<input type="checkbox"/>
d. Encryption used in transfers	<input checked="" type="checkbox"/>	research	<input type="checkbox"/>
e. Total number of participants is less than 50	<input type="checkbox"/>	m. Personal data kept in the EEA	<input type="checkbox"/>
f. Information compliance training for staff has	<input checked="" type="checkbox"/>	n. Research is not used to make decisions	<input checked="" type="checkbox"/>
been completed - data protection, information security, FOI	<input type="checkbox"/>	o. De-identification	<input checked="" type="checkbox"/>
g. Hashing or salting employed	<input type="checkbox"/>	p. Short retention limits	<input type="checkbox"/>
h. Adherence to privacy by design principles	<input checked="" type="checkbox"/>	q. Restricted access controls	<input checked="" type="checkbox"/>
i. Probabilistic risk management	<input type="checkbox"/>	r. Other (please specify)	<input type="checkbox"/>

Step 7 – What steps have you taken to make sure the research is as accurate as possible and there are minimal unintended consequences? Please tick

a. data management plan in place	<input checked="" type="checkbox"/>	d. this study builds on a pilot study	<input type="checkbox"/>
b. data management plan is peer reviewed	<input type="checkbox"/>	e. an extension to a previous similar	<input type="checkbox"/>
c. PI experience levels - no experience;	<input type="checkbox"/>	study registered by DPO,	<input type="checkbox"/>
some experience;	<input type="checkbox"/>	if there is, please provide the number	<input type="checkbox"/>
very experienced	<input checked="" type="checkbox"/>		

Step 8 – How have you assessed what participants will think of the research? What have you done to address concerns raised? Please tick

a. pilot project	b. use of focus group	c. information sheet/consent form	d. experience drawn from previous study
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Step 9 – For the controls/steps specified in Step 5, who will make sure the controls are put in place? Please tick

a. PI <input type="checkbox"/>	b. Head of School <input checked="" type="checkbox"/>	c. other body (please specify)