



## Data Protection Impact Assessment (DPIA) Template

A DPIA is designed to describe your processing and to help manage any potential harm to individuals' in the use of their information. DPIAs are also important tools for demonstrating accountability, as they help you as a Controller to comply with the requirements of the Data Protection Legislation. Non-compliance with DPIA requirements can lead to fines imposed by the Information Commissioners Office (ICO); this includes not carrying out a DPIA at all, carrying out a DPIA in an incorrect way or failing to consult the ICO where required.

DPIA's are not new; the use of Privacy Impact Assessments has become common practice in the NHS and can provide evidence of compliance within the Data Security and Protection toolkit (DSPT); DPIAs build on that practice.

It is not always clear whether you should do a DPIA or not but there are a number of situations where a DPIA **should** be considered or where a DPIA is a **legal requirement**. If you can tick against the criteria below it is highly recommended that you undertake a DPIA and if you decide not to, ensure that you document the reasons for your decision.

You as Controller **MUST** carry out a DPIA where you plan to:

	Tick or leave blank
Use <b>profiling or automated decision-making</b> to make significant decisions about people or their access to a service, opportunity or benefit;	<input type="checkbox"/>
Process <b>special-category data or criminal-offence data on a large scale</b> ;	<input type="checkbox"/>
<b>Monitor a publicly accessible place</b> on a large scale;	<input type="checkbox"/>
Use <b>innovative technology</b> in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Carry out <b>profiling</b> on a large scale;	<input type="checkbox"/>
<b>Process biometric or genetic data</b> in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
<b>Combine, compare or match data</b> from multiple sources;	<input type="checkbox"/>
Process personal data <b>without providing a privacy notice</b> directly to the individual in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Process personal data in a way that involves <b>tracking</b> individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Process <b>children's</b> personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them;	<input type="checkbox"/>
Process personal data that could result in a <b>risk of physical harm</b> in the event of a security breach.	<input type="checkbox"/>

You as Controller should **consider** carrying out a DPIA where you

	Tick or leave blank
Plan any major project involving the use of personal data;	<input type="checkbox"/>
Plan to do evaluation or scoring;	<input type="checkbox"/>
Want to use systematic monitoring;	<input type="checkbox"/>
Process sensitive data or data of a highly personal nature;	<input type="checkbox"/>
Processing data on a large scale;	<input type="checkbox"/>
Include data concerning vulnerable data subjects;	<input type="checkbox"/>
Plan to use innovative technological or organisational solutions;	<input checked="" type="checkbox"/>

A new DPIA should be carried out if you decide that there is a significant enough change to what you originally intended but it is good practice for DPIAs to be kept under review and revisited when necessary.

There is guidance to help you. Your Data Protection Officer (DPO) can be consulted before completing a DPIA in order to provide specialist advice and guidance or simply to talk things through with you.



Background Information	
Date of your DPIA :	23/09/2025
Title of the activity/processing:	Microsoft 365 GP IT Sussex
Who is the person leading this work?	SCW GP IT Team
Who is the Lead Organisation?	SCW
Who has prepared this DPIA?	SCW GP IT Team
Who is your Data Protection Officer (DPO)?	Laura Taw – Senior IG Consultant and GP DPO
Describe what you are proposing to do: (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	<p>As part of the Sussex Integrated Care Board (ICB) Microsoft 365 (formerly Office 365) rollout to GP practices across the estate, a range of productivity features and applications are being introduced. These tools primarily enhance collaboration, task management, and efficiency without directly processing personal or sensitive data in new ways. However, as they represent novel integrations within the NHS environment, they require coverage under a DPIA to identify and mitigate any potential data protection risks, ensure compliance with UK GDPR and Data Protection Act 2018, and align with NHSE guidelines. This DPIA outlines the relevant applications, provides a brief description of their functions. The assessment draws on Microsoft's own DPIA guidance for Microsoft 365, adapted for the GP estate context, focusing on secure, phased implementation to support hybrid working while maintaining data integrity.</p> <p>This DPIA applies specifically to GP practices within the Sussex ICB footprint, where tools will integrate with existing systems like EMIS or SystemOne for non-clinical productivity tasks. No new processing of special category health data is anticipated, but risks related to incidental data exposure or user error will be addressed.</p> <p><b>What are these applications:</b> The applications included in this DPIA are Microsoft Bookings, Microsoft Forms, Microsoft Power Automate, Microsoft Intune, Microsoft planner, Microsoft Shifts, Microsoft Stream, Microsoft Sway, , Microsoft To-Do, My Analytics, Office Online, Whiteboard (Plan 2)</p> <p><b>Description:</b></p> <p><b>Microsoft Bookings:</b> The Microsoft Bookings app makes scheduling and managing appointments easier, the app includes a web-based booking calendar and integrates with Outlook to optimise staff's calendar and give our customers the ability and flexibility to book a time that works best for both people. The data location for this is the United Kingdom.</p> <p><b>Microsoft Power Automate:</b> is a cloud-based service developed by Microsoft that enables users to create automated workflows</p>

**Commented [LT1]:** It may not just be patient data that is processed within these apps, we have to consider processing of staff information and other data subject information also.

**Commented [MC2]:** Do we have this confirmation consistently for all product?



between various applications and services. Launched in 2016 and rebranded in 2019, it forms part of the Microsoft Power Platform suite, alongside tools like Power BI and Power Apps.

**Microsoft Intune:** is a cloud-based endpoint management solution from Microsoft that enables organisations to manage and secure devices, applications, and data across a hybrid workforce. Originally launched as part of the Enterprise Mobility Suite in 2011 and rebranded overtime, it is now integrated within the Microsoft Endpoint Manager framework and the broader Microsoft 365 ecosystem.

**Microsoft Planner:** is a task management tool within the Microsoft 365 ecosystem, designed to help individuals and teams organise, assign, and track tasks, plans, and projects in a unified interface. Originally launched in 2016 as a simple Kanban-style app, it has since evolved, with a significant update in 2024 introducing the "new Planner" that integrates Microsoft To Do for personal tasks, classic Planner for team collaboration, and Project for the web for advanced project management. This creates a single hub accessible primarily through Microsoft Teams, the web, or mobile apps.

**Microsoft Shifts:** is the schedule management tool integrated within Microsoft Teams, designed to assist organisations in creating, updating, and overseeing employee schedules, particularly for frontline and shift-based workers. Originally introduced in 2019 as part of Teams, it has evolved to include enhanced time-tracking and collaboration features, making it a central hub for workforce management in hybrid environments.

**Microsoft Stream:** is a video service where people within SCW can upload, view, and share videos securely. You can share recordings of classes, meetings, presentations, training sessions, or other videos that aid your team's collaboration. The data location for this is the United Kingdom.

**Microsoft Sway:** is a cloud-based digital storytelling application from Microsoft, designed to enable users to create and share interactive presentations, newsletters, reports, and personal stories with minimal effort. Originally launched in 2014 as a preview and made generally available in 2015, it forms part of the Microsoft 365 suite, leveraging AI to automatically generate visually appealing layouts from user-provided content.

**Microsoft To Do:** Microsoft To Do is a cloud-based task management application from Microsoft, designed to help users create, organise, and prioritise personal and shared to-do lists across devices. Originally launched in 2017 as a successor to the acquired Wunderlist app, it has evolved into a core component of



the Microsoft 365 productivity suite, with ongoing updates for enhanced usability and integration.

**My Analytics:** MyAnalytics uses data from your mailbox, such as data about your email, your meetings, and includes data about your calls and chats in Teams. MyAnalytics stores your data in your mailbox itself and gets the same protection that your email and calendar have. MyAnalytics is not designed to enable employee evaluation, tracking, automated decision making, profiling, or monitoring. MyAnalytics provides insights to individuals through a personalized dashboard, a weekly digest, an Insights Outlook add-in, and inline suggestions in Outlook. MyAnalytics has no mechanism or option that allows anyone but the user to access the personalized information that is displayed through these surfaces, unless that person purposefully and independently shares that information. Insights provided by MyAnalytics cannot be used for automated decision making or for profiling. MyAnalytics does not give employees access to new personally identifiable information on other co-workers. MyAnalytics converts data into insights by doing calculations on information that people generate just by going about their workday. Most of the data that employees see in MyAnalytics is simply an aggregation of information to which they already have access, but that they wouldn't be able to quickly perform calculations on without some support. MyAnalytics data is processed and stored in the employee's Exchange Online mailbox. MyAnalytics processes data from these sources: Exchange Online email and calendar data, chat and call signals from Skype for Business and from Teams, and—if both the organization's IT administrator and an individual opt in—Windows 10 application activity history. The MyAnalytics app supports General Data Protection Regulation (GDPR) compliance and is designed to support customers' needs by following GDPR requirements. The data location for this is the United Kingdom. MyAnalytics is a personal productivity insights tool within the Microsoft 365 ecosystem, designed to help individuals understand and optimise their work habits based on data from everyday activities like emails, meetings, and collaborations. Originally launched as Delve Analytics in 2015 and rebranded in 2017, it has since integrated into Microsoft Viva Insights, providing AI-driven nudges and analytics to promote better work-life balance and efficiency.

**Microsoft Office for the web (formerly known as Office Online):** is a browser-based suite of productivity applications from Microsoft that enables users to create, view, edit, and collaborate on documents from any device with an internet connection and a supported web browser. Originally launched as Office Web Apps, it has evolved to integrate seamlessly within the Microsoft 365 ecosystem, providing a lightweight alternative to the full desktop versions of Office apps.



**Whiteboard (Plan 2):** is a cloud-based digital canvas application from Microsoft, designed to facilitate real-time collaboration for brainstorming, planning, and visualising ideas among teams or individuals. Originally launched in 2018 as a standalone app and later integrated into Microsoft Teams and the broader Microsoft 365 ecosystem, it provides an infinite canvas for drawing, note-taking, and content organisation. The "(Plan 2)" designation refers to one of the licensing tiers (alongside Plan 1 and others), which are assigned based on Microsoft 365 subscription types, such as education or enterprise plans. As of 2025, there are no significant feature differences between these plans, though they may be used to gate future enhancements.

**Exchange Foundation for certain SKUs** is a foundational service plan within the Microsoft 365 licensing framework, designed to provide basic Exchange Online capabilities without granting full mailbox or email access. It enables auxiliary features that depend on Exchange infrastructure in subscriptions (or SKUs) where standard Exchange Online is not included, such as certain education, frontline worker, or add-on plans. The plan supports hybrid environments and has been part of Microsoft licensing since at least 2016

**Microsoft Forms:** is a web-based application developed by Microsoft, enabling users to create custom surveys, quizzes, polls, questionnaires, and registrations with ease. Originally launched in 2016, it has evolved as part of the Microsoft 365 ecosystem, incorporating AI-driven features and smart recommendations to simplify content creation and analysis, with a refreshed interface introduced in early 2025.

**Microsoft 365 Apps for enterprise (formerly known as Office 365 ProPlus):** is a subscription-based suite of productivity applications from Microsoft, providing always-up-to-date desktop versions of core Office tools for business users. Originally introduced as part of Office 365 plans and rebranded in 2020, it enables installation on multiple devices with regular feature and security updates, integrating seamlessly with cloud services to enhance collaboration and efficiency in enterprise environments.

**How are we going to roll it out or enable these apps?**

These applications are already technically available to use by logging in with a nhs.net account on the internet, however SCW have recommended these should not be used until we are ready to support, and training is in place.

For some applications we can limit access using the NHSmail LOA (Local Admin) rights to turn off the access in Teams, using the On/Off toggle available to us, also for those in the Microsoft App Store we have limited ability to install software.



We can roll these apps out in two ways for those in the App Store we can utilise Certero (remote application deployment tool) to roll out the application, and apply the toggle, and for Teams applying the toggle where possible will allow access.

The table below shows how the apps are accessible:

Name	LOA Toggle On / Off	Web Access (Browser)	Teams App	Microsoft App Store	Note
Microsoft Bookings	Yes	Yes	Yes	No	
Microsoft Power Automate	No	Yes	No	No	
Microsoft Forms	Yes	Yes	Yes	No	
Microsoft Intune	Yes	No	No	No	
Microsoft Planner	Yes	Yes	Yes	No	
Microsoft Shifts	Yes	Yes	Yes	No	
Microsoft Stream	Yes	Yes	No	No	
Microsoft Sway	Yes	Yes	Yes	No	
Microsoft Team's	Yes	Yes	Yes	Yes	



	Microsoft To Do	Yes	Yes	Yes	No	
	My Analytics	Yes	No	No	No	
	Office Online	Yes	Yes	Yes	No	
	SharePoint (includes OneDrive)	Yes	Yes	Yes	No	
	Whiteboard (Plan 2)	Yes	No	Yes	Yes	
	Exchange Foundation for Certain SKUs	Yes	No	No	No	
	Office ProPlus	Yes	Yes	Yes	Yes	
	<p><b>Potential Risks</b></p> <p>The only considered risk which is minimal is that some of the apps are based in the European Union which are Planner, Yammer, Whiteboard, and Forms. Sway, and Workplace Analytics which are based in the United States. Data flow registers will be updated accordingly by IAAs where these apps are used as per their workflows.</p> <p><b>Rolling Applications out</b></p> <p>We are planning on rolling these applications out for the first pilot sites October 2025.</p>					
<b>Are there multiple organisations involved?</b> (If yes – you can use this space to name them, and who their key contact for this work is).	No					
<b>Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA?</b> (If so then include the details here).	No					
<b>Detail anything similar that has been undertaken before?</b>	Yes, SCW staff currently uses Survey Monkey for Surveys. Forms app could potentially replace Survey Monkey saving cost to SCW.					

**Commented [MC3]:** Has any consideration been given to the risks involved with US based processing?

## 1. Categories, Legal Basis, Responsibility, Processing, Confidentiality, Purpose, Collection and Use

### 1.1.

What data/information will be used?	Tick or leave blank	Complete
Tick all that apply.		
Personal Data	<input type="checkbox"/>	1.2
Special Categories of Personal Data	<input type="checkbox"/>	1.2 AND 1.3
Personal Confidential Data	<input type="checkbox"/>	1.2 AND 1.3 AND 1.6



Sensitive Data (usually criminal or law enforcement data )	<input type="checkbox"/>	1.2 but speak to your IG advisor first
Pseudonymised Data	<input type="checkbox"/>	1.2 and consider at what point the data is to be pseudonymised
Anonymised Data	<input type="checkbox"/>	Consider at what point the data is to be anonymised
Commercially Confidential Information	<input type="checkbox"/>	Consider if a DPIA is appropriate
Other	<input checked="" type="checkbox"/>	Consider if a DPIA is appropriate

## 1.2.

Processing has to be lawful so identify which of the following you believe justifies what you are proposing to do and include an explanation as to why in the relevant box. You must select at least one from a – f.

Article 6 (1) of the GDPR includes the following:	
<b>a) THE DATA SUBJECT HAS GIVEN CONSENT</b>	Tick or leave blank <input type="checkbox"/>
Why are you relying on consent from the data subject? <a href="#">Click here to enter text.</a>	
What is the process for obtaining and recording consent from the Data Subject? (How, where, when, by whom). <a href="#">Click here to enter text.</a>	
Describe how your consent form is compliant with the Data Protection requirements? (There is a checklist that can be used to assess this). <a href="#">Click here to enter text.</a>	
<b>b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY</b> <small>(The contract needs to be between the Controller and the individual and not concern data being processed due to someone else having a contract with the Controller. Processing can happen before the contract is entered into e.g. processing a pre-health assessment for a private or cosmetic procedure that is a paid for service with the delivery of that care done under contract between the Patient and the Practitioner).</small>	Tick or leave blank <input type="checkbox"/>
What contract is being referred to? <a href="#">Click here to enter text.</a>	
<b>c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT</b> <small>(A legal obligation mandates processing of data as a task in itself where there are likely to be legal measures available if not adhered to e.g. an Employer has a legal obligation to disclose salary information to HMRC).</small>	Tick or leave blank <input type="checkbox"/>
Identify the legislation or legal obligation you believe requires you to undertake this processing. <a href="#">Click here to enter text.</a>	
<b>d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON</b> <small>(This will apply only when you need to process data to protect someone's life. It must be necessary and does not only relate to the individual whose data is being processed. It can also apply to protect another person's life. Emergency Care is likely to fall into this category but planned care would not. You may need to process a Parent's data to protect the life of a child. The individual concerned is unlikely to be able to provide consent physically or legally; if you are able to gain consent then this legal basis will not apply).</small>	Tick or leave blank <input type="checkbox"/>
How will you protect the vital interests of the data subject or another natural person by undertaking this activity? <a href="#">Click here to enter text.</a>	
<b>e) IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER</b> <small>(This is different to 6 c). If you are processing data using this basis for its lawfulness then you should be able to identify a specific task, function or power that is set out in law. The processing must be necessary, if not then this basis does not apply).</small>	Tick or leave blank <input type="checkbox"/>
What statutory power or duty does the Controller derive their official authority from? <a href="#">Click here to enter text.</a>	





<b>f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY</b> (Public authorities can only rely on legitimate interests if they are processing for a legitimate reason other than performing their tasks as a public authority. See the guidance for more information about the legitimate interest test).	Tick or leave blank <input type="checkbox"/>
<b>What are the legitimate interests you have?</b> Click here to enter text.	

Article 9 (2) conditions are as follows:	
<b>a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT</b> (Requirements for consent are the same as those detailed above in section 1.2, a))	Tick or leave blank <input type="checkbox"/>
<b>b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION</b> (Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	Tick or leave blank <input type="checkbox"/>
<b>c) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON WHERE THEY ARE PHYSICALLY OR LEGALLY INCAPABLE OF GIVING CONSENT</b> (Requirements for this are the same as those detailed above in section 1.2, d))	Tick or leave blank <input type="checkbox"/>
<b>d) <i>It is necessary for the operations of a not-for-profit organisation such as political, philosophical, trade union and religious body in relation to its members</i></b>	NA
<b>e) <i>The data has been made public by the data subject</i></b>	NA
<b>f) <i>For legal claims or courts operating in their judicial category</i></b>	NA
<b>g) SUBSTANTIAL PUBLIC INTEREST</b> (Schedule 1, part 2 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	Tick or leave blank <input type="checkbox"/>
<b>h) PROCESSING IS NECESSARY FOR THE PURPOSES OF PREVENTIVE OR OCCUPATIONAL MEDICINE, FOR THE ASSESSMENT OF THE WORKING CAPACITY OF THE EMPLOYEE, MEDICAL DIAGNOSIS, THE PROVISION OF HEALTH OR SOCIAL CARE OR TREATMENT OR THE MANAGEMENT OF HEALTH OR SOCIAL CARE SYSTEMS AND SERVICES ON THE BASIS OF UNION OR MEMBER STATE LAW OR PURSUANT TO CONTRACT WITH A HEALTH PROFESSIONAL AND SUBJECT TO CONDITIONS AND SAFEGUARDS</b> (Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	Tick or leave blank <input type="checkbox"/>
<b>i) PROCESSING IS NECESSARY FOR REASONS OF PUBLIC INTEREST IN THE AREA OF PUBLIC HEALTH, SUCH AS PROTECTING AGAINST SERIOUS CROSS-BORDER THREATS TO HEALTH OR ENSURING HIGH STANDARDS OF QUALITY AND SAFETY OF HEALTH CARE AND OF MEDICINAL PRODUCTS OR MEDICAL DEVICES, ON THE BASIS OF UNION OR MEMBER STATE LAW WHICH PROVIDES FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE RIGHTS AND FREEDOMS OF THE DATA SUBJECT, IN PARTICULAR PROFESSIONAL SECRECY</b> (Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).	Tick or leave blank <input type="checkbox"/>
<b>j) PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH <u>ARTICLE 89(1)</u> BASED ON UNION OR MEMBER STATE LAW WHICH SHALL BE PROPORTIONATE TO THE AIM PURSUED, RESPECT THE ESSENCE OF THE RIGHT TO DATA PROTECTION AND PROVIDE FOR</b>	Tick or leave blank <input type="checkbox"/>



**SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE FUNDAMENTAL RIGHTS AND THE INTERESTS OF THE DATA SUBJECT.**

(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).

**1.3.**

If using special categories of personal data, a condition for processing under Article 9 of the GDPR must be satisfied in addition to a condition under Article 6. You must select at least 1 from a) to c) or g) to j). NOTE: d), e) and f) are not applicable

**1.4.**

Confirm who the Controller and Processor is/are. Confirm if the Controller/s are solely or jointly responsible for any data processed?

(Identify any other parties who will be included in the agreements and who will have involvement/share responsibility for the data/information involved in this project/activity. Use this space to detail this but you may need to ask your DPO to assist you. Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only).

Name of Organisation	Role
SCW	Other
GP Practice	Sole Controller
NHS Sussex ICB	Other
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.

**1.5.**

Describe exactly what is being processed, why you want to process it and who will do any of the processing?

GP Practice data will be processed and data from the applications can be saved and, in some cases, analysed.

**1.6.**

Tick here if you owe a duty of confidentiality to any information. ☐

If so, specify what types of information. (e.g. clinical records, occupational health details, payroll information)

Click here to enter text.

**1.7.**

How are you satisfying the common law duty of confidentiality?

Consent - Implied

If you have selected an option which asks for further information please enter it here

Click here to enter text.

**1.8.**

Are you applying any anonymisation/pseudonymisation technique or encryption to any of the data to preserve the confidentiality of any information?

No

If you are then describe what you are doing.

Click here to enter text.

If you don't know then please find this information out as there are potential privacy implications with the processing.



**1.9.**  
**Tick here if you are intending to use any information for a purpose that isn't considered as direct patient care. P**  
**If so describe that purpose.**  
Not Applicable  
Data will be used for many pupposes outside direct care, however, all data used should be anonymised or non-identifiable.

**1.10.**  
**Approximately how many people will be the subject of the processing?**  
Other unknown population number

**1.11.**  
**How are you collecting the data?** (e.g. verbal, electronic, paper (if you need to add more selections then copy the last 'choose an item' and paste, the text has been left unlocked for you to do this.)  
Electronic form  
Choose an item.  
Choose an item.  
Choose an item.  
Choose an item.  
**If you have selected 'other method not listed' describe what that method is.**  
[Click here to enter text.](#)

**1.12.**  
**How will you edit the data?**  
Data will be collected and analysed but not edited

**1.13.**  
**How will you quality check the data?**  
Not Applicable

**1.14.**  
**Review your business continuity or contingency plans to include this activity. Have you identified any risks?**  
No  
**If yes include in the risk section of this template.**

**1.15.**  
**What training is planned to support this activity?**  
All training is to be filtered via the training team downstream to the support teams and the end-users. Videos and artefacts are available on Microsoft Stores and other training providers such as Udemy for further training material.

## 2. Linkage, Data flows, Sharing and Data Opt Out, Sharing Agreements, Reports, NHS Digital

**2.1.**  
**Are you proposing to combine any data sets?**  
No  
**If yes then provide the details here.**  
[Click here to enter text.](#)

**2.2.**



**What are the Data Flows?** (Detail and/or attach a diagram if you have one).  
Data will be flowing in/out of practices through using the different MS products. This is difficult to capture but should be acknowledged that when sitting on NHS Microsoft tenant, there is propensity for data to be accessed by anyone else beyond the GP practice using the same tenant

**2.3.**  
**What data/information are you planning to share?**  
Information from areas such as:

- Results of surveys and quizzes, or a user can share their Analytics if they so wish.

**2.4.**  
**Is any of the data subject to the National Data Opt Out?**  
No - it is not subject to the national data opt out  
**If your organisation has to apply it describe the agreed approach to this**  
[Click here to enter text.](#)  
**If another organisation has applied it add their details and identify what data it has been applied to**  
[Click here to enter text.](#)  
If you do not know if it applies to any of the data involved then you need to speak to your Data Protection Officer to ensure this is assessed.

**2.5.**  
**Who are you planning to share the data/information with?**  
The actual data will not be shared apart from being analysed; the results of the analysis could be shared.

**2.6.**  
**Why is this data/information being shared?**  
Not Applicable

**2.7.**  
**How will you share it?** (Consider and detail all means of sharing)  
Sharing the form could be a link via email, or could be in teams or other Microsoft apps  
**Tick if you are planning to use Microsoft Teams or another similar online networking/meeting solution that may have the facility to store or record conversations or related data as part of the sharing arrangements**  
✓  
**Provide details of how you have considered any privacy risks of using one of these solutions**  
Not Applicable

**2.8.**  
**What data sharing agreements are or will be in place?**  
Not Applicable

**2.9.**  
**What reports will be generated from this data/information?**  
Not Applicable

**2.10.**  
**Are you proposing to use Data that may have come from NHS Digital (e.g. SUS data, HES data etc.)?**  
No  
**If yes, are all the right agreements in place?**  
[Choose an item.](#)  
**Give details of the agreement that you believe covers the use of the NHSD data**  
[Click here to enter text.](#)



If no or don't know then you need to speak to your Data Protection Officer to ensure they are put in place if needed.

### 3. Data Processor, IG Assurances, Storage, Access, Cloud, Security, Non-UK processing, DPA

#### 3.1

**Are you proposing to use a third party, a data processor or a commercial system supplier?**

Yes

If yes use these spaces to add their details including their official name and address. If there is more than one then include all organisations. If you don't know then stop and try and find this information before proceeding.

Microsoft Limited Registration Number: Z6296785

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

#### 3.2

**Is each organisation involved registered with the Information Commissioner?** Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	Registered	Registration details or comments if not registered
Microsoft Limited	Yes	Z6296785
<a href="#">Click here to enter text.</a>	Choose an item.	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	Choose an item.	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	Choose an item.	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	Choose an item.	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	Choose an item.	<a href="#">Click here to enter text.</a>

#### 3.3

**What IG assurances have been provided to you and does any contract contain IG clauses that protect you as the Controller?** (e.g. in terms and conditions, their contract, their tender submission). Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	Brief description of assurances obtained
Microsoft UK	Cyber Essentials Plus – Certificate No: <b>3e9637c4-c173-4faf-9f7b-24af856ecd48</b> Expiry date 16/10/25 ISO 27001; ISO 27017; ISO 27018 Microsoft products and services such as Azure, Dynamics 365, Enterprise Mobility + Security, Office Microsoft 365, SQL Server/Azure SQL Database, and Windows 10 offer robust encryption for data in transit and data at rest
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>



### 3.4

#### What is the status of each organisation's Data Security Protection Toolkit?

##### [DSP Toolkit](#)

Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	ODS Code	Status	Published date
MICROSOFT UK	8JH14	24/25 Standards Exceeded	30/06/2025
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.

### 3.5

#### How and where will the data/information be stored? (Consider your answer to 2.7 and the potential storage of data in any online meeting or networking solution).

Customer and personal data are processed and stored in accordance with the Microsoft Online Services Terms and Microsoft's obligations as a data processor under the UK General Data Protection Regulation (UKGDPR) and can easily be used by customers in compliance with the UKGDPR.

The data for European-based tenants is stored on servers in Europe, it follows a controlled lifecycle designed to comply with UK GDPR data subject requests.

### 3.6

#### How is the data/information accessed and how will this be controlled?

The only apps where data / information is accessed are:

1. Microsoft Forms, you open the form for which you want to review the results, and then select the Responses tab you'll see summary information data about your form, such as number of responses and average time it took for respondents to complete your form. Next to each question, you'll see the number of responses and a chart that shows a breakdown of responses.  
Select More Details under individual questions on the Responses tab to see more details for that question. You can easily view all of the response data for your form in Microsoft Excel. Select Open in Excel on the Responses tab to capture a snapshot of your current response data in a workbook.  
Only the Form creator can action the response unless the access is shared. You can share the Forms to the person, the person can see the results and export the data to Excel.
2. My Analytics which can only be accessed by the user as MyAnalytics is not designed to enable employee evaluation, tracking, automated decision making, profiling, or monitoring. MyAnalytics provides insights to individuals through a personalized dashboard, a weekly digest, an Insights Outlook add-in, and inline suggestions in Outlook.
3. Workplace Analytics captures data from everyday work in Microsoft 365 to identify collaboration patterns that impact productivity, workforce effectiveness, and employee engagement. by getting these details such as usage trends and workplace performance it will help SCW improve decision-making for IT, identify communication and training opportunities, increase organisational efficiency, facilitate culture change, mitigate collaboration security risks, and extend the value and productivity of employees.

### 3.7

#### Is there any use of Cloud technology?



Yes
<b>If yes add the details here.</b> All the apps in this DPIA are part of Microsoft N365 national agreement using NHSD shared tenant This allows anyone within the NHS shared tenant to access the data within the apps.
<b>3.8</b> <b>What security measures will be in place to protect the data/information?</b> Role Based Access controls are used throughout <b>Is a specific System Level Security Policy needed?</b> No <u>If yes or don't know then you need to speak to your Data Protection Officer to ensure one is put in place if needed.</u>
<b>3.9</b> <b>Is any data transferring outside of the UK?</b> (you must determine this so only select don't know if you have further investigations to make but the DPIA will not be approved without this information) Yes <b>If yes describe where and what additional measures are or will be in place to protect the data.</b> No additional measures because Customer and personal data are processed and stored in accordance with the Microsoft Online Services Terms and Microsoft's obligations as a data processor under the UK General Data Protection Regulation (GDPR) and can easily be used by customers in compliance with the GDPR.  The data for European-based tenants is stored on servers in Europe, it follows a controlled lifecycle designed to comply with GDPR data subject requests i.e., Forms is hosted in the European Union but it follows a controlled lifecycle designed to comply with GDPR data subject requests.
<b>3.10</b> <b>What Data Processing Agreement is already in place or if none, what agreement will be in place with the organisation and who will be responsible for managing it?</b> Not Applicable
<b>4. Privacy Notice, Individual Rights, Records Management, Direct Marketing</b>
<b>4.1</b> <b>Describe any changes you plan or need to make to your Privacy Notice and your proposed completion date?</b> (There is a checklist that can be used to assess the potential changes required or if you wish for it to be reviewed then add the link below). Not Applicable
<b>4.2</b> <b>How will this activity impact on individual rights under the GDPR?</b> (Consider the right of access, erasure, portability, restriction, profiling, automated decision making). Not Applicable
<b>4.3</b> <b>How long is the data/information to be retained?</b> As long as required for specific reasons it is created
<b>4.4</b> <b>How will the data/information be archived?</b> This will be dependent on the governing retention policies
<b>4.5</b> <b>What is the process for the destruction of records?</b> Aligned with Infosec HM5 standard as per NHS Digital guidelines.
<b>4.6</b> <b>What will happen to the data/information if any part of your activity ends?</b> This will be dependent on the governing retention policies



#### 4.7

**Will you use any data for direct marketing purposes?** (you must determine this so only select don't know if you have further investigations to make but the DPIA will not be approved without this information)

No

**If yes please detail.**

[Click here to enter text.](#)

### 5. Risks and Issues

#### 5.1

**What risks and issues have you identified? The DPO can provide advice to help complete this section and consider any measures to mitigate potential risks.**

Describe the source of risk and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	Likelihood of harm	Severity of harm	Overall risk
Data Store in European Union	Remote	Minimal	Low
Data Store in United States	Remote	Minimal	Low
All staff within the NHS Shared Tenant has the potential to access data within the app included under this agreement.	Possible	Significant	High
<a href="#">Click here to enter text.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>

#### 5.2

**Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in 5.1**

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved (SIRO)
Data Store in European Union	Risk accepted	Tolerated	Low	<a href="#">Choose an item.</a>
Data Store in United States	Risk accepted	Tolerated	Low	<a href="#">Choose an item.</a>
All staff within the NHS Shared Tenant has the potential to access data within the app included under this agreement.	No identifiable patient/staff data should be included within these apps.	Reduced	Low	<a href="#">Choose an item.</a>
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>	<a href="#">Choose an item.</a>

#### 5.3

**What if anything would affect this piece of work?**

Not Applicable

#### 5.4

**Please include any additional comments that do not fit elsewhere in the DPIA?**

Not Applicable





## 6. Consultation

### 6.1

Have you consulted with any external organisation about this DPIA?

No

If yes, who and what was the outcome? If no, detail why consultation was not felt necessary.

[Click here to enter text.](#)

### 6.2

Will you need to discuss the DPIA or the processing with the Information Commissioners Office? (You may need the help of your DPO with this)

No

If yes, explain why you have come to this conclusion.

[Click here to enter text.](#)

## 7. Data Protection Officer Comments and Observations

### 7.1

Comments/observations/specific issues

[Click here to enter text.](#)

## 8. Review and Outcome

Based on the information contained in this DPIA along with any supporting documents, you have determined that the outcome is as follows:

Choose an item.

If you have selected item B), C) or D) then please add comments as to why you made that selection

[Click here to enter text.](#)

We believe there are

Choose an item.

If you have selected item B) or C) then list these in the amber boxes below and then consider additional measures you could take and include these in the green boxes below

Residual risks and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	Likelihood of harm	Severity of harm	Overall risk
<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.

Additional measures you could take to reduce or eliminate residual risks identified as medium or high risk above (B and C)

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved (SIRO)
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.
<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>	Choose an item.	Choose an item.	Choose an item.



Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

Signed and approved on behalf of Park Crescent Health Centre

Name: Bret Stevenson

Job Title: Business manager/Caldicott Guardian

Signature: B Stevenson    Date: 07/10/2025

Signed and approved on behalf of Click here to enter text.

Name: Click here to enter text.

Job Title: Click here to enter text.

Signature: Click here to enter text.    Date: Click here to enter a date.

**Please note:**

You should ensure that your Information Asset Register and Data Flow Mapping Schedules are updated where this is relevant.

This DPIA can be disclosed if requested under the Freedom of Information Act (2000). If there are any exemptions that should be considered to prevent disclosure detail them here:

Click here to enter text.