

Data Protection Impact Assessment Steps

Processing

Identify the data processing tasks that will be undertaken:

- How will you collect, use, store and delete data? What are the sources of the data? Will you be sharing data with anyone?
- What types of processing identified as likely high risk are involved? What are your plans for age-assurance and parental controls?
- Does your service involve profiling/automated decision-making/geolocation elements?

Describe the scope of the processing:

- What is the nature of the data, and does it include special category/criminal offence data?
- How much data will you be collecting and using? How often?
- How long will you keep it?
- How many individuals are affected?
- What geographical area does it cover?

Describe the context of the processing:

- What is the nature of your service? Are you designing it for children? If not, are children under 18 likely to access it anyway?
- What is the likely age range of users? How much control will they have? Would they understand & expect you to use their data in this way?
- Does your service use any nudge techniques? Are there prior concerns over similar services or particular security flaws?
- Is your service novel in any way? What is the current state of technology in this area?
- Are there any current issues of public concern that you should factor in, particularly over online risks to children?
- Are there relevant industry standards, codes of practice or public guidance in this area?
- What responsibilities do you have under the applicable equality legislation for England, Scotland, Wales and Northern Ireland?
- Is there any relevant guidance or research on the development needs, wellbeing or capacity of children in the relevant age range?
- Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Describe the purposes of the processing:

- What do you want to achieve with your service?
- What is the intended effect on individuals?
- What are the benefits for you/more broadly/children?

Consultation - Consider how to consult with relevant stakeholders

- Describe when and how you will seek individuals' views including children and parents – or justify why it's not possible to do so.
- Who else do you need to involve within your organisation? Do you need to ask your processors to assist?
- Do you plan to consult experts (e.g. in children's rights/developmental needs)? If not, why not?

Describe compliance and proportionality measures

- What is the lawful basis for processing? If consent ensure relevant information sheet & consent forms.
- Does processing achieve your purpose? Is there another way to achieve this outcome?
- How will you prevent function creep (data/tech use beyond original intended purpose)? How will you ensure data quality & data minimisation?
- If you use AI, how will you avoid bias and explain its use? What information will you give individuals? How will you help to support their rights?
- What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Identify and Assess Risks

Describe source of risk and nature of potential impact on individuals.

Please note: If working with children, include an assessment of particular risks to children as listed in the DPIA standard in [Age appropriate design: a code of practice for online services](#). You may need to consider separately for different age groups.

Likelihood of harm	Severity of harm	Overall risk
Remote/possible/ probable	Minimal/significant/ severe	Low/medium/high