Becoming confident with DPIAs

The Information Commission (ICO) website has detailed guidance on undertaking DPIAs. This guide does not replace that, but aims to provide answers to common questions that arise when LOTI works with project teams across the public sector.

A Data Protection Impact Assessment (DPIA) is a process to help you identify and minimise the data protection risks of processing personal data. It is a way to protect the individuals whose data you will be processing and sharing.

A DPIA is mandatory when your data processing is likely to result in a high risk to the rights and freedoms of individuals. It is an important safety mechanism. Your organisation will have a screening checklist you can complete to identify whether a DPIA is mandatory for your activities.

Don't be intimidated. Undertaking a DPIA is usually a collaborative process and requires input from a range of people. Project leads and data owners have the most knowledge to complete the majority of a DPIA, with guidance from an information governance specialist or Data Protection Officer (DPO).

Data Owners

The responsibility for undertaking a DPIA, considering and addressing the risks raised, and maintaining oversight of the DPIA and the data itself, belongs to the data owner.

The data owner is the person who is responsible for the data and has the authority to decide what happens to it. They should know the attributes of the data, where it comes from, what is done with it, and why.

A data owner in a local authority (who may be called an Information Asset Owner) is usually at a Director, Assistant Director or Head of Service level. A similar level of knowledge and responsibility is expected in other types of organisations.

Multiple data owners

There may be more than one data owner involved, especially where data is being shared with other departments or organisations. The data owners can agree who will lead on completion of a DPIA, but they must all be involved, to ensure that the DPIA accurately represents all the data processing due to be undertaken.

Who undertakes a DPIA

The task of completing a DPIA and assessing the risks may be delegated to staff who work for the data owner(s) or are working on a relevant project. In practice, content will come from subject matter experts relevant to the processing and members of project teams.

Specialist support

You must ask the advice of your Data Protection Officer (DPO) when undertaking a DPIA. The responsibility for ensuring a DPIA is done remains with the data owner(s), but your DPO will provide advice on how to complete a DPIA, how you may be able to mitigate risks, whether the DPIA is correct and sufficient, and whether the DPO feels the processing can go ahead.

You may need to consult other specialists, like the IT Security Manager or AI Lead.

How to undertake a DPIA

A DPIA must:

- describe the nature, scope, context and purposes of the processing;
- assess necessity, proportionality and compliance measures;
- identify and assess risks to individuals; and
- identify any additional measures to mitigate those risks.

The ICO guidance on How do we do a DPIA? describes the key elements of a DPIA and helps you to decide what to do in each section and at each stage of a DPIA.

This guide provides examples of how to complete some sections of a DPIA. Areas not covered by this guide include choosing appropriate lawful basis conditions, and identifying risks and mitigations.

Using what you have

There is some repetition in the text you use in a funding bid, a policy proposal, a DPIA and a Data Sharing Agreement (DSA), though each document or assessment does a different job.

You can copy and paste text from one document to another, as long as you ensure that the text you use is relevant for the objective of that document or assessment.

Clear and accessible

A DPIA should be understandable to someone outside your team and your organisation. This means you need to explain your data processing, ambitions and any constraints clearly. You also need to describe some of the history of your work to provide context for what you want to do now. Have you clearly described what is happening and why? Imagine whether your family or friends would understand what you do after reading the DPIA.

The examples are relatively short, to provide a guide on what to include. In practice, some of the descriptions may be several pages long once you combine context and purpose for example.

What good looks like is not necessarily about length though. You must have enough content to clearly and accurately describe the data processing. However, a long description with multiple unexplained acronyms, 'policy speak' and repetition does not work for the reader.

Use of AI

You cannot ask AI to write your DPIA in its entirety. The DPIA needs to address your specific activity and audience.

There are recognised issues with using AI to identify relevant legislation or interactions between multiple pieces of legislation, as what is suggested isn't always correct or applicable.

AI can be helpful to give you leads, for further research into, for example, the relevant part of the legislation that gives you your duties. You may find AI helpful in reviewing text you have written to make it clearer or more concise.

You must check any outputs of AI.

Additional guidance

If you are struggling to complete these DPIA sections even after reading the examples, you may want to refer to the LOTI Data Projects Methodology. Working through the methodology will help you to ensure that you are clear on what your project is trying to achieve, who's involved, and what information they need and why. Identifying gaps in planning and process is one of the purposes of undertaking a DPIA, so it is common for some aspects of your project to change as you undertake a DPIA.

LOTI also has guidance on the information governance consideration for system and process testing.

Examples

While there is some reference to real situations, the examples are fictional.

1. Context of the activity
2. Purpose of processing
3. Source of data
4. How you use the data
5. Effects on and intended outcomes for individuals
6. Describing funding
7. When External Funding Requires Independent Analysis
8. Sharing data
9. Benefits

In some DPIA templates context and purpose are separate. Where there is only a purpose section, include the context language too.

Example - Context of the activity

This is the place to describe the origin story of your activity. What has led you here? Why do you already hold the personal data? Why do you want to process personal data?

Unclear	**Needs improvement**	**Effective**
The council's funding bid was approved for Phase One of the EHN project. • No background is provided. • Acronym is not explained. • Only someone who knows the project well will know what the project entails. • Gives no information, such as relevant legislation or council policy, that can form part of the justification for the processing of personal data.	Handling homelessness applications costs the council a significant portion of its budget. The council made a bid for government funding to carry out its Ending Homelessness Now (EHN) project. • Acronyms are explained. • It's still unclear what the project entails. • It is not specifically identified as a council priority and no other drivers, such as legislation, are described. • The specific funding source isn't identified.	London has seen an increase in homelessness over the last 5 years. The Mayor's Housing Strategy is to end homelessness in the city in the next 3 years. Dealing with homeless individuals costs London councils £xxx a year. The council has taken part in a previous project to identify the gaps in the process that are opportunities to prevent someone becoming homeless. New funding from the Department of Housing is now available to London boroughs to run a Phase One research project to follow the journey of homeless individuals to identify types of support that could prevent or shorten their homelessness journey. This will build on the learning from the previous project and allow boroughs to identify where individuals are crossing borough boundaries and seeking support from multiple boroughs during their homelessness journey. At the London Borough of Thames, this work fits as part of our Ending Homelessness Now (EHN) project.

		• The current situation is described. • How we reached this situation is described. • Clearer to people who don't know your specialist area. • Acronyms are explained. • The specific funding source is identified.

Example - Purpose of processing

The purpose section is for your plan and ambitions.

- Who is taking action or sharing data?
- What are you doing and what do you aim to achieve?
- Why do you need or want to do it? Do you have a duty or a power to act?

Your description of purpose should be concise, but long enough to clearly explain the activity and expected outcomes. In some cases this may require several pages.

Unclear	**Needs improvement**	**Effective**
The data project is aiming to reduce homelessness. This is one of the Mayor's ambitions for London. We'll share data across the council and others to do this.	The Keep-the-house Project aims to identify local authority tenants at risk of rent arrears and homelessness, so we can meet our duties to reduce homelessness from the Homelessness Reduction Act 2017 (amending the Housing Act 1996) and as one of the	The Keep-the-house Project aims to identify local authority tenants at risk of rent arrears and homelessness. Local authorities and health trusts will share data to identify those at risk of homelessness and whether those risks involve health-related concerns. The parties aim to identify and offer appropriate support.

• Does not properly reference the council's duties from legislation or statutory guidance. • Doesn't identify the partners who will be sharing data. • Purpose is vague.	Mayor's ambitions. We will share data between councils and health trusts to do this. • The legislation is named but it would be better to have more detail of the specific duties. • The aim is briefly described. • The project is named with a title that makes sense to people. • The sharing parties are identified.	Part 7 of the Housing Act 1996 provides the statutory under-pinning for taking action to prevent homelessness and provide assistance to people threatened with or actually homeless. It was amended by the Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) (England) Order 2002 to: (a) ensure a more strategic approach to tackling and preventing homelessness, in particular by requiring a homelessness strategy for every housing authority district; and (b) strengthen the assistance available to people who are homeless or threatened with homelessness by extending the priority need categories to homeless 16 and 17 year olds; care leavers aged 18, 19 and 20; people who are vulnerable as a result of time spent in care, the armed forces, prison or custody, and people who are vulnerable because they have fled their home because of violence. The Homelessness Reduction Act 2017 also amended the Housing Act 1996, by requiring local councils to provide meaningful help to all eligible homeless people or those at risk of homelessness. • The project is named with a title that makes sense to people. • You have more clearly described the duties

		that come from multiple pieces of legislation. • There is enough detail on the legislation that a reader can check this for themselves. • The project and its ambitions are described. • The sharing parties are identified.
We need to share data on children and families to meet our safeguarding duties. • Too vague. • No description of what type of data. • Doesn't identify who is sharing data. • No clear aim.	The project will share data on children and families with the police to help the council meet its duties under the Children's Act and by following WTTSG 2026. • Statutory guidance (Working Together to Safeguard Children) is not clearly referenced. • Doesn't describe the duties of the police. • Assumes specialist knowledge to understand the breadth of the activity.	Section 47 of the Children's Act 1989 places a duty on local authorities to investigate concerns about a child's welfare and take action to safeguard and promote the child's welfare. To do this, we need to share data with the police to gain a better understanding of the needs of a child and the risks they are facing. Additionally, Safeguarding Children Partnerships are mandatory (under the Children Act 2004) multi-agency bodies, led by the local authority, police, and health agencies. They coordinate efforts and work with additional agencies and organisations to protect from harm and promote the welfare and well-being of children in their area. The data processed and shared is of children and families as well as professional opinions and reports of concern from schools, the public, GPs, health settings like hospitals. • Describes the duties of each organisation that is sharing data. • References specific legislation that describes the duties.

		• Describes the type of data to be processed and shared. • Describes the aim of the work.
The police have a duty to protect the public. This project meets that aim by reducing anti-social behaviour, specifically knife crime. • The main purpose is only briefly stated. • Would benefit from more text describing the police force's duties. • No description on what data or who will share it.	Operation Knife-no-more is the operational delivery mechanism for the Home Office Knife Crime Concentration Fund. It seeks to achieve a 25% reduction in knife crime across 12 identified high harm locations. The project will share data on arrests with local authorities to assess risk. • The project is named so it can be identified more easily among other projects. • Some description of the project is given. • The sharing party (local authority) is named but not its duties. • The type of data is briefly mentioned.	Operation Knife-no-more is the operational delivery mechanism for the Home Office Knife Crime Concentration Fund. It seeks to achieve a 25% reduction in knife crime across 12 identified high harm locations. Police and local authorities will share data on individuals to help identify alleged perpetrators and take decisions on providing diversion activities to support young people away from knife crime. The project will help to meet the duties both parties have under the Serious Violence Duty (SVD) in the Police, Crime, Sentencing and Courts Act 2022, which requires local partnerships to complete a Strategic Needs Assessment (SNA) to understand how violence is affecting their communities, and design a response through a Violence Reduction Strategy. It will also help to meet both parties' duties under the Crime and Disorder Act 1998 to work in cooperation to regularly review and implement strategies to reduce crime, disorder, and substance misuse in their local areas.

		• Describes the parties and why they have a statutory duty to work together. • Names the legislation that gives the duties. • Names the type of individuals whose data will be shared. • Provides more detail on what the project will do and its intended outcomes.

Example - Source of data

It is important to identify the sources of personal data. This ensures that all data controllers are identified and allows all parties to be clear on where each piece of data originates. It is helpful to describe the journey of the data, in writing and in process maps. Describing all this helps to identify potential risks or actions for other areas of a DPIA, like access controls, retention and disposal, data security, business continuity and licensing.

Understanding the source(s) of data will also help your DPO to decide whether what you want to do with the data is compatible with the original purpose for gathering the data. There may also be implications for identifying the relevant lawful basis conditions that apply to your activity.

Unclear	**Needs improvement**	**Effective**
Data will be shared between the borough councils taking part, along with the Metropolitan Police.	When a child is involved in a domestic abuse incident, the police need to check the school name for the child	Metropolitan Police officers enter details of domestic abuse incidents into the Abuse-Stop report, held in the Crime-No-More system. Where a child is involved or present at an incident, the

• Has named the data controllers for the personal data. • No description of where in each organisation the data comes from. • No indication of why the organisation processes the personal data that is to be shared.	with the council, before contacting the school. • Some description of the data held by each party. • Still too vague about which parts of each organisation hold the data. • Not clear what data is disclosed to the school from the police.	data in the report may include the name of the child's school. To verify the school name or seek to identify a school name where one wasn't gathered during the incident, the police will access data held by the council. Within councils, personal data on children's school attendance is sourced from the Educate-Me system, managed by the Education Department. The police will access the council system and check the name and address of the child. Once a school name is identified or verified, the police will share details of the incident and the child's involvement to the school. • Clearly describes which data controller holds what data. • Describes why the data is held. • Describes where the data comes from and where it goes. • Some description of the systems will help you when describing the data security and retention later in the DPIA.

Example - How you use the data

The use of the data must be clearly described. This description is very helpful when identifying gaps in process and relevant privacy risks for your activity. For example, the effective description here should prompt you to consider the privacy information you give to individuals who complete applications.

Unclear	**Needs improvement**	**Effective**
Applications will be checked against council data to confirm eligibility. • Not clear what data is involved. • Not clear where the data is held. • Not clear which team is involved.	The applicant provides information on their benefits to the refuse team, which we check with the benefits team. If eligible, the application is approved. • Clearer which teams are involved. • Describes a basic outcome. • Unclear what data is involved.	An applicant must provide details of the relevant disability-related benefit(s) they receive. The name and address of the applicant and their disability status is passed to the benefits team to confirm if the individual receives the stated benefits. If the benefit is confirmed, this is notified to the refuse and recycling team. The team adds the individual to the assisted collections list for a year. New applications are made each year. The application form is deleted once the individual is added to the list. • Identifies which teams are involved. • States the personal data used, which includes health data (special category data). • Describes the process. • Describes what data is kept and what is deleted. This is relevant to data minimisation, as the refuse team only needs a record that a check was confirmed, not the disability and benefit details.

Example - Effects on and intended outcomes for individuals

Would individuals expect you to process their data in this way? Will your processing prevent individuals from exercising a right, or using a service or contract eg will they gain or lose access to a benefit or service, be prosecuted or fined, or receive support? Effects on individuals may be positive and negative. This is especially relevant for crime and fraud purposes, where the identification of perpetrators is positive for victims but arguably negative for the perpetrators.

Unclear	**Needs improvement**	**Effective**
Crime reduction and less victims. The activity is expected by society. • Vague. • Does not specify outcomes for different categories of individuals.	Perpetrators and victims are helped to feel differently about crimes. Reduction in offending. • Different categories of data subjects are identified. • Still unclear on the range of intended outcomes.	A restorative justice programme is an approach to crime and conflict that brings those who have been harmed and those responsible into communication to repair the damage and find a positive way forward with their lives. Perpetrators of crime receive support to understand the impact of their crimes and to reduce the likelihood of reoffending. Victims are supported to take part in a programme that helps them address the perpetrator and potentially bring a sense of control. Restorative justice programmes can be healing to perpetrators and victims. A reduction in reoffending benefits potential victims. • Identified the categories of data subject. • Clearly described the effects intended for each category of data subject. • Potential victims are recognised as being

		affected by the longer term outcome of reduced reoffending.

Example - Describing Funding

A business case has many sections describing budgets and funding bids. In the DPIA you do not need full budget breakdowns, but you would describe that the government has set a fund for achieving specific outcomes and the purpose of the funding you have received.

This is relevant to the DPIA both to show justification of why you wish to undertake the activity (eg because the government has said it is important enough to offer funding for), and because it prompts questions when undertaking the DPIA, of whether personal data will be shared with the funder, or if there are any other privacy issues that external funding might raise.

Unclear	**Needs improvement**	**Effective**
The council has received £3m in government funding. We're using this to help benefit recipients into exercise programmes at outdoor gyms. • No detail of the funding or its purpose. • The connection between the funding and the activity is not described in enough detail.	**Version One** The Mayor's Fund for Public Health is providing £20m in funding to local authorities to help people exercise. The council is using its bid money to build outdoor gyms in several parks and run an exercise programme. • Clearer title for the funding.	The council has received £3m from the £20m available from the Mayor's Fund for Public Health. The aim of the funding is for councils to develop resources for residents that encourage exercise and outdoor physical fitness. This fits with the council's strategic ambitions for use of greenspaces in the borough. The council will be using the funding to develop outdoor gyms in 3 parks across the borough. Once built, a programme will run for 1 year to help selected benefits recipients undertake more

	• Connection made between the fund and what the council will do with the money. • Purpose still not fully understandable to someone not involved in the project. **Version Two** The council's fiscal strategy for external funding in 2025/26 establishes the desire for bids to 85% of the government funding offers that are applicable to the council. This is described in the SLA with the council's financial support contractor, with a KPI set and quarterly analysis. Q1 bids include one for £3m from the Mayor's Fund for Public Health for park activities expansion. The bid covers the capital costs for the build, with ongoing revenue costs identified in the budget for Greenspaces. • Text has been copied from a financial report. • Acronyms aren't explained. • Too much detail of budgets that aren't relevant to the	outdoor physical activity. No personal data will be shared with the Mayor's Fund, only updates on creation of the gyms and statistics on number of users over the first 6 months of activity. • The origin of the funding and its purpose is described. • The connection between the funding and the activity is described. • It's clear whether the funders receive personal data.

	consideration of processing personal data. • The activity isn't clearly described.	

Example - When External Funding Requires Independent Analysis

Government funding may require external evaluation of a project and the success or failure of the funding. Other funders may have similar requirements. This likely means that you need to share some of the personal data you are processing with the external evaluator. This must be described in the DPIA and will have an impact on privacy notices, processes and contracts and/or Data Sharing Agreements.

Unclear	**Needs improvement**	**Effective**
The council has received government funding for a project to train social workers to deliver CBT-style support to children. External evaluation assessment required. • No detail of the funding or the name of the funding department. • The connection between the funding, and the activity doesn't have enough detail. • There's no description of	The council made a bid for funding from the DfE to take part in the Help-the-Kids project. The council will train a set of its social workers to deliver CBT-style approaches to young people who receive support from the council. Success will be monitored before further funding is released. • Acronyms are not described. • There's a clearer title for the funding.	The council is a participant in the Department of Education's (DfE) Help-the-Kids Project. The project provides funding to the council to train a set of social workers with CBT-style approaches (Cognitive Behavioural Therapy). This support will be delivered to young people under the care of the council. The project Phase One is 6 months. The DfE has appointed Green Park University to independently analyse the baseline and monthly outputs from the council on the activities and achievements of the young people involved. Personal and special category (health and equalities) data on the young people being supported will be shared by the council to Green

the oversight expected from the funding organisation and what personal data they may want.	• Connection made between the fund and what the council will do with the money. • Doesn't explain how success will be measured or monitored. • Doesn't identify what data needs to be shared with the funder or evaluator.	Park University for this independent analysis. The DfE will receive aggregated, anonymous outputs from Green Park University on the outcomes of this phase of the project. The funding agreement between the council and the DfE requires a Data Sharing Agreement between the council and Green Park University covering the data shared for the purposes of the independent analysis. Improvement KPIs need to be met before the council can submit a bid for further funding. • Acronyms are explained. • The independent analysis is described. • The data to be shared is described. • The relevant organisation and documents are described (Funding Agreement and Data Sharing Agreement). • Clearer description that this is a phased project.

Example - Sharing data

A DPIA is often mandatory where data is being shared between two organisations. You need to describe what data is shared, why, and with whom.

Unclear	**Needs improvement**	**Effective**
The council shares footage with the MPS for crime prevention purposes. • Acronym is not explained. • Purpose is vague. • The data to be shared isn't identified.	Live and recorded CCTV footage will be shared with the Metropolitan Police (MPS) and City of London Police (CoLP) for crime prevention purposes. Other data shared as necessary. • Acronyms are explained but not all parties are listed. • Some description of the data to be shared but 'other data' is not descriptive enough.	Sharing surveillance footage between local authorities (LAs) (including City of London) and between local authorities and the Metropolitan Police (MPS) and City of London Police (CoLP), for the purposes of the prevention and detection of crime and counter terrorism purposes. Live and recorded CCTV footage will be shared. The parties will also share data to aid the identification of relevant footage and establish legal compliance. This will include crime numbers, descriptions of individuals or types of activities, vehicle registrations from ANPR cameras and any 'hits' on vehicles the MPS identifies from the Police National Computer, and any information necessary for activities under the Regulation of Investigatory Powers Act 2000 (RIPA). • Acronyms are explained. • The parties are identified. • Clearly states the data to be shared, including the data needed to identify the correct footage.

Benefits

This section of a DPIA describes how your intended outcomes deliver benefits.

You can only process personal data when you have a lawful purpose for doing so. The lawful basis is often drawn from legislation or statutory guidance, with a council having the duty or power to achieve specific outcomes. Describing the outcomes and benefits to individuals helps to justify the lawful basis for processing the data, so they must be achievable. If your processing is not achieving the expected benefits, you may no longer be able to justify processing the personal data.

You may use bullet points or subheadings (especially if the benefits differ between parties), but you must clearly describe what benefits you expect to achieve from processing the personal data. At what point are the benefits expected to be achieved? This section may expand to several pages, depending on the breadth and complexity of the activity.

It is helpful to categorise benefits, to show that you are considering all aspects and applying appropriate weight when assessing whether the benefits to processing data outweigh the individual's right to privacy.

Particularly for public sector work, it is helpful to consider this from three perspectives:

- Individuals
- The organisation(s)
- Society

When we list the benefits for individuals, these might be benefits to the individuals whose data is being processed, but can be to other individuals. Processing the data of a suspected criminal isn't necessarily a benefit to them, but it is a benefit to the actual or potential victim.

DPIA Subject	Benefits		
	Individuals	**Parties**	**Society**
CCTV - Local authority and police collection and sharing of CCTV/surveillance footage	• Protection of life and against harm for potential victims. • Knowing that images are shared creates a lower fear of crime and greater confidence that criminals will be identified and brought to justice. • Faster and better response for victims of crime.	These benefits apply to the local authorities and the police. • More effective use of resources. • Increased likelihood of police resource deployment to boroughs based on need. • Faster access to relevant material for investigations and immediate incident response. • Greater overall coverage of CCTV. • Quicker and more accurate identification of location of crime.	• Reduction in likelihood of crime and terror events. • Better allocation of resources leading to more responsive and cost effective public services. • Reduction in crime or fear of crime. • Reduction in cost of dealing with crime. • Increased positive outcomes (and speed of positive outcomes).

Supporting Arrested Care Leavers	• Receipt of timely, targeted support following arrest, tailored to individual needs and circumstances. • Improved safeguarding outcomes through early identification of vulnerability. • Enhanced wellbeing through coordinated multi-agency intervention. • Improved access to services, including housing, mental health, and substance misuse support. • Reduced risk of reoffending, exploitation, or escalation into further harm.	**Metropolitan Police Service (MPS)** • Improved safeguarding outcomes. • Reduced repeat demand through early intervention. **Local Authorities** • Enhanced ability to fulfil statutory corporate parenting and safeguarding duties effectively. **LIIA / London Councils** • Access to reliable data to inform strategic planning and service improvement. **All** • More effective and efficient use of public resources across partner agencies. • Improved ability to plan, target, and allocate	• More effective use of public sector resources through early intervention and prevention. • Reduction in crime, reoffending, and associated harm. • Increased public safety and reduced fear of crime. • Reduced long-term costs associated with criminal justice, health, and social care intervention. • Improved outcomes for vulnerable individuals, contributing to stronger and safer communities.

		resources based on identified need and risk. • Strengthened multi-agency working and information sharing in line with statutory responsibilities.	
Child Safeguarding and Wellbeing	• Faster, more coordinated and consistent response to safeguarding concerns. • A more accurate assessment of the risk and need. • Improved outcomes for children and their families. • Receipt of better-tailored services. • Improved support to, for example, treat substance misuse, manage anger issues and change perpetrator behaviour. • Faster and more consistent approach to investigation and	The effective multi-agency assessment of safeguarding concerns in respect of vulnerable children; to support their welfare and improve their life outcomes. It brings together professionals from a range of agencies into an integrated multi-agency team to deliver: • Faster, more coordinated and consistent response to safeguarding concerns. • A more accurate assessment of the risk and need.	• More effective use of resources and reduction in spend on activities in the aftermath of poor child safeguarding outcomes. • Reduction in crime or fear of crime. • Children grow into more engaged, resilient and productive adults.

	prosecution of perpetrators.	• A more thorough and focused management of all cases. • Improving outcomes for children and their families. • Better understanding between professionals. • Greater efficiencies in processes and resources. • Preventing and detecting crime.	

DPIA Review

Your DPIA is a living document and it needs to be reviewed. There is no mandatory timescale for review, and it will depend on your activity. You should consider a DPIA review when:

- Changes to legislation or statutory guidance affect your processing.
- You reach the end of a pilot period.
- When issues occur, like a data protection breach, or poor data quality produces outputs that are not fit for purpose.
- You receive complaints from data subjects that identify problems with your activity and the use of personal data.
- New parties join a data sharing arrangement.
- You identify that the expected benefits aren't being achieved. If your processing is not achieving the expected benefits, you may no longer be able to justify processing the personal data.

If none of the above occur, consider reviewing your DPIA every 1-2 years.

LOTI has guidance on how to undertake an information governance review.