Data Protection Impact Assessment
Mini Assessment

The objective of this document is to assess and obtain evidence of the extent to which the products support a controller in being able to demonstrate compliance with GDPR. The document will also assess the measures which are taken to protect data and how security is implemented within the solution.

Organisation's Name (including legal entity name)	Association for Video Interaction Guidance (AVIGuk)
Date Supplier / Organisation completed questions	01/03/2025
Supplier website URL	www.videointeractionguidance.net
Full address of supplier / organisation's main site	124, City Road, London EC1V 2NX
Name of main contact for this review	Hilary Kennedy
Main contact's role in the organisation	Joint Chilef Executive
Main contact's email address	hkennedy@videointeractionguidance.net
Main contact's telephone number	+447717855318
Number of dedicated information security staff working for the supplier / organisation	0.1 Full time equivalent
Number of years the supplier / organisation has been in business	13
Number of sites (include service providers)	Virtual Organisation
Addresses of sites providing services to supplier / organisation	
Where would our data be hosted? UK, EEA or other - please specify.	EEA – Kobotoolbox and Google servers are located in Ireland

1. Describe the system's main purpose and/or use	For VIG practitioners to easily record data from VIG meetings with clients in a standardised format.
2. List of types of data that the system is designed to hold; (flag any data items which are special categories of data e.g. TBC)	Practitioner data: name, email, service/organisation Client data: pseudo-anonymised client unique identifier, age group of their child or the person with whom they want to improve their relationship with,

	relationship with the person with whom they wish to improve their relationship with, any other interventions being undertaken. Session details: date of meeting, meeting number (i.e. first, second)
3. List of purposes / activities for processing personal data that the system is designed for	a) It provides practitioners (and their clients) with their clients' data in structured and accessible formats, that be used to assess client progress b) It scores the standardised measures automatically and provides some support/guidance for using the measures and interpreting the scores c) It provides AVIGuk with outcome data, which will be analysed to assess the effectiveness of VIG d) It will allow services to access all their data at a service level to aid their service evaluation, supporting funding decisions.
4. Do you comply with the UK GDPR and DPA?	Yes – Data are stored on UK servers and AVIGuk have a Data Protection Agreement with Kobo, the organisation who's software AVIGuk use.
5. Do you following industry best practice? Do you hold certifications such as ISO27001 or Cyber Essentials Plus?	We follow all recommended best practice as data processors. We do not hold Cyber Essentials Plus but our Data Policy demonstrates how we safely manage data. No personally identifiable data are held on AVIGuk systems.
6. Is all data encrypted at rest and in transit? Please provide details of the type of encryption used.	Kobotoolbox uses HTTPS and 256 bit SSL to encrypt the data during transfer. All database content is encrypted at rest (disk-level encryption) but we do not use project level encryption (data-level encryption) as this would render access impractical by many organisations. Client data are pseudo-anonymised, practitioners must adhere to the terms of use, which provide guidance on pseudo-anonymisation, and data are regularly audited to ensure compliance with these terms. Strict access controls mean only individuals nominated by services can access their services data.
7. Does your system use 2 factor authentication?	Individuals nominated by services to manage their service's data should create an account on Kobotoolbox with 2FA enabled.
8. Does your system support Single Sign On either via SAML or OAuth? Does this support automated user provisioning either full SCIM or basic Just-In-Time provisioning?	Not applicable
9. Do you use any form of network protection including IDS/IPS? Please specify.	Not applicable

10. Do you centrally manage all your endpoints?	No – AVIGuk manage their own endpoints but services may access their own data through nominated personnel and their endpoints will be managed by their organisations. Access controls are managed by user level permissions. In AVIGuk no individual level data will ever be downloaded and saved from Kobotoolbox onto local machines. Data will be accessed through the API and and aggregated. All processing will be done in memory.
11. Do you have AntiVirus on all your devices?	Yes