



# Data Protection Impact Assessment (DPIA) Policy

Version 2

Updated: March 2023

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# 1. Objectives

- 1.1. We recognise the need for legal compliance and accountability and endorse the importance of the integrity, availability, confidentiality, resilience and security arrangements to safeguard personal data. We also recognise that there are times that personal data is shared with, and/or received from, other organisations and that this needs to be in accordance with data protection, human rights, duty of confidentiality and ethical considerations.
- 1.2. This policy sets out the key obligations and accountability in relation to Data Protection Impact Assessments (DPIA) to which we are fully committed.

# 2. Scope

- 2.1. In order to fulfil our statutory and operational obligations we have to collect, use, receive and share personal, special personal and crime data about living people, eg,
  - Pupils and their families
  - current, past, prospective employees
  - clients and customers
  - contractors and suppliers
  - Governors
- 2.2. This policy covers all aspects of handling personal data, regardless of age, format, systems and processes purchased, developed and managed by/or on behalf of us and any person directly employed or otherwise by us.
- 2.3. This policy reflects the commitment to compliant with data protection legislation, particularly the Data Protection Act 2018 and the UK General Data Protection Regulation 2016 (UKGDPR).
- 2.4. There is a legal requirement to conduct a DPIA to ascertain the impact processing of personal data may have on the rights and freedoms, eg, privacy, of individuals. A DPIA should be undertaken prior to the processing and advice sought from the Data Protection Officer (DPO) where appropriate. If the DPIA identifies unmitigated high risks to the protection of personal data, the Information Commissioner's Office (ICO) should be consulted PRIOR to any processing being undertaken.
- 2.5. A DPIA shall be particularly required, as defined under UKGDPR, in the case of:
  - a) a systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person;
  - b) processing on a large scale of special categories of data referred to in Article 9(1), or of personal data relating to criminal convictions and offences referred to in Article 10; or
  - c) a systematic monitoring of a publicly accessible area on a large scale.

### **3. Policy**

- 3.1 DPIAs are an important tool in ensuring that we integrate data protection by design and by default into our technical systems and day to day business operations, by embedding privacy risk considerations into new and changes to systems and business processes.
- 3.2 The DPIA screening questionnaire will be able to identify when a DPIA is required/and or appropriate.
- 3.3 The DPIA document will record how data protection legislation is complied with, identify risks and mitigating actions and trigger, where appropriate when the DPO and /or the ICO needs to be consulted.
- 3.4 To be effective the DPIA screening/document needs to be completed at the early planning stages of new projects/initiatives involving personal data.

### **4. Assessment and Monitoring**

- 4.1. An assessment of compliance with requirements will be undertaken in order to provide:
  - Assurance
  - Gap analysis of policy and practice
  - Examples of best practice
  - Improvement and training plans
- 4.2. Reports will be submitted to the Governing Body.

### **5. Authority for this policy**

- 5.1. The Governing Body has overall responsibility for ensuring that our school complies with all relevant data protection obligations.
- 5.2. The Headteacher acts as the representative of the data controller on a day-to-day basis and is responsible for the approval of this policy.
- 5.3. The Data Protection Officer will be the key contact for the provision of independent advice on all things data protection. The DPO will provide advice and support when dealing data subject enquiries and communications with the Information Commissioner's Office.