

St Alban's Catholic Primary School, a Voluntary Academy

General Data Protection Regulation

Data Protection Impact Assessment

School Mission Statement: To love, learn, share and respect in the light of Jesus.

Introduction

The Information Commissioner's Office requires the completion of a data protection impact assessment when there is the

Systematic monitoring of publicly accessible places on a large scale does not have widespread use of CCTV monitoring school users' access and behavior.

The Information Commissioner's Office recommends the completion of a data protection impact assessment when there is a plan to:

Use new technologies

Process biometric data

Match or combine data sets from different datasets or different sources

Track individuals' location or behaviour (including online)

Process data that might endanger the individual's physical health or safety in the event of a security breach.

Given the ICO's requirement and recommendations the school will complete and update DPIAs when the processing of data includes child protection data, behaviour data, CCTV usage and any introduction of the use of biometric data. The identity and whereabouts of any individuals for whom police and/or social care services have required secrecy, pseudonyms or extra confidentiality will also be covered by a DPIA.

Should a significant new technology be introduced, then a DPIA will be completed.

Further guidance identifying high risk data includes:

Data concerning vulnerable subjects

Sensitive data or data of a highly personal nature

The nine key elements of a DPIA

1. Identify the need for a DPIA
2. Describe the processing
3. Consider consultation
4. Assess necessity and proportionality
5. Identify and assess risks
6. Identify measure/s to mitigate the risks
7. Sign off and record outcomes
8. Integrate outcomes into a project plan
9. Keep the DPIA under review

The DPO will be consulted in the drafting of a DPIA.

Refer to table for guidance when completing Step 5

Likelihood of harm				
Severity of impact	Serious harm	Low risk	High risk	High risk
	Some impact	Low risk	Medium risk	High risk
	Minimal impact	Low risk	Low risk	Low risk
		Remote	Reasonable possibility	More likely than not

School DPIA template

1. Identify the need for a Data Protection Impact Assessment

Summarise why you need a DPIA. Give links to related documents. Explain in broad terms the the processing involved.

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2. Describe the processing

How will you collect, use, store and delete data? What is the source? Will you be sharing the data with anyone? Does the processing involve types of data or processing identified as high risk?

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Describe the scope of the processing

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

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Describe the context of the processing

What is the nature of the relationship with the individuals? How much control will they have? Would they expect their data to be used in this way? How vulnerable are the groups? Are there prior concerns with this processing? Are there known security flaws? Is the system novel in any way? Does the school have any certified code of conduct that covers the project?

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Describe the purposes of the processing

What do you want to achieve? What is the intended outcome for the individual? What are the benefits for the school and the wider community?

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3. Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek the views of pupils, families, staff, governors and any partner agencies. Do you plan to consult information and/or security experts?

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4. Assess necessity and proportionality

Describe compliance and proportionality measures: what will be the legal basis for the processing (public task or consent or contract)? Are there alternative approaches that would achieve a similar result? Can you control data portability? Can you ensure that the amount of data acquired is the minimum necessary and that the project will not have unrestrained growth?

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5. Identify and assess risk

Use the table in the introduction to calculate risk.
Describe the source of risk and the potential impact on individuals and/or on the school. Describe any risks to compliance.

Hazard (the potential harm, damage or consequence)	Likelihood of harm	Severity of harm	Overall risk

6. Identify measures to reduce risk

Identify additional measures to be taken to reduce risk to an acceptable residual level (required for all risks identified as medium or high in Step 5).

Hazard (the potential harm, damage or consequence)	Effect on risk	Residual risk	Measure approved

7. Sign off and record outcomes

Item	Name & Date	Notes
Measures approved by:		
Residual risks approved by:		
DPO advice provided:		
Summary of DPO advice:		
DPO advice accepted or overruled by:		Explain reasons if overruled:
Explanation		
Consultation responses reviewed by:		If the decision departs from stakeholders' views, explain reasons for going ahead
Explanation		
8. This project will commence on:		Has the project been modified to include the measures to reduce risk and DPO advice?
9. This DPIA will be kept under review by:		The DPO should also review ongoing compliance
This DPIA will be shared with	Name	Role