“Project Title”
Data Protection Impact Assessment

Organisation Name/Data Controller Name: *YOUR SCHOOL NAME* **Date final DPIA issued** Click or tap to enter a date. [Title]
Project Brief and Go Live Date: *Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties. You may find it helpful to link to other relevant documents related to the project, for example a project proposal. It may be useful to reference the screening questions – why is a DPIA needed?*

Project Manager/Owner:

Name:	*Please complete for your school*
Job Title:	
Service:	
Telephone:	
Email:	

Information Asset Owner/s:

Name:	*Please complete for your school*
Job Title:	
Service:	
Telephone:	
Email:	

System Administrator/ICT Contact (if applicable):

Name:	*Please complete for your school*
Job Title:	
Service:	
Telephone:	
Email:	

Part One – Information Flow

The collection, use and deletion of personal information should be described here. Please use a flow diagram or another visual way of explaining information flows.

Part Two – Privacy Risks questionnaire

- *This should be filled out during consultation between the Project Officer(s) and Data Protection Officer.*
- *Risks should be associated with the Principles of the General Data Protection Regulation (the UK GDPR).*
- *You only need to consider risks arising from any new procedures and/or solutions.*

<table>
<tr><th>Privacy Issue</th><th colspan="4">Comments</th><th>Is there a risk? Address in Part Three</th></tr>
<tr><td colspan="6">1. General</td></tr>
<tr><td>Have you identified the Information Asset Owner?</td><td colspan="4">Include name of information asset owner</td><td>☐</td></tr>
<tr><td>How many individuals will be affected by this project?</td><td colspan="4">Please make an approximation if needed.</td><td>☐</td></tr>
<tr><td>Who are the Data Subjects?</td><td colspan="4">Eg. Pupils, staff members, parents, visitors etc.</td><td>☐</td></tr>
<tr><td rowspan="13">Please select any information that will be processed:</td><td colspan="2">Personal Identifiers/information</td><td colspan="2">Special Category</td><td rowspan="13">☐</td></tr>
<tr><td>☐</td><td>Name</td><td>☐</td><td>Sex life</td></tr>
<tr><td>☐</td><td>Address/Postcode</td><td>☐</td><td>Sexual Orientation</td></tr>
<tr><td>☐</td><td>Date of Birth</td><td>☐</td><td>Religion</td></tr>
<tr><td>☐</td><td>Telephone Number/Email</td><td>☐</td><td>Philosophical belief</td></tr>
<tr><td>☐</td><td>Emergency contact details</td><td>☐</td><td>Political opinion</td></tr>
<tr><td>☐</td><td>National Insurance Number</td><td>☐</td><td>Trade Union Membership</td></tr>
<tr><td>☐</td><td>NHS Number</td><td>☐</td><td>Ethnic Origin</td></tr>
<tr><td>☐</td><td>Gender</td><td>☐</td><td>Medical history details</td></tr>
<tr><td>☐</td><td>Images (photo/film)</td><td>☐</td><td>Physical health information</td></tr>
<tr><td>☐</td><td>Pseudonymised information</td><td>☐</td><td>Mental health information</td></tr>
<tr><td>☐</td><td>IP addresses</td><td>☐</td><td>Genetic/Biometric (eg. Thumbprint)</td></tr>
<tr><td></td><td>☐</td><td>Other (please state):</td><td></td><td></td><td></td></tr>
</table>

Privacy Issue	Comments		Is there a risk? Address in Part Three
How will the personal data be collected?	Choose an item.		☐
Does this processing include data matching, automated decision making or profiling? *(please describe)*			☐
2. Lawfulness, Fairness, and Transparency			
What is the lawful basis for processing personal information? If you are using more than one condition please specify which condition relates to specific data. *(Please speak with your DPO about this)*	Choose an item.	Choose an item.	☐
	Specify:		
	If Legitimate Interests/Public Interest Assessment (see guidance), is completed please add:		
If you are processing Special Category Information (highlighted in red above), what is the lawful basis for processing this information *(Please speak with your DPO about this)*	Choose an item.	Choose an item.	☐
	Basis in law and schedule condition (if applicable)/specify:		
	Please refer to the guidance		
If you are using consent how are you collecting this and how will people be able to withdraw their consent?			☐
How will you tell people about this processing?	*e.g. leaflet, part of a form, on a website, communication*		☐
Do you need to update your privacy notices?	☐	Yes	
	☐	No	

Privacy Issue	Comments		Is there a risk? Address in Part Three
3. Purpose Limitation			
Are you going to use information you already hold about individuals for a purpose it is not currently used for?	☐	Yes, please specify why it is currently held and under which legal basis:	☐
	☐	No	
Have you identified all of the purposes for which you will use personal information?	☐	Yes	☐
	☐	No. If no, why not?	
Will people expect their information to be processed in this way?	☐	Yes	☐
	☐	No, please give details:	
4. Data Minimisation			
How will you ensure you are only collecting information that is relevant to this specific purpose?			☐
Have you considered what information you could disregard without compromising the project?	☐	Yes, please detail if any has been removed:	☐
	☐	No	
5. Accuracy			
How are you going to ensure that the personal information will be kept accurate and up to date?			☐
How are you going to ensure that the quality of the data you collect is sufficient for your intended purpose?			☐

Privacy Issue	Comments		Is there a risk? Address in Part Three
If you are procuring a new system does it allow you to amend and / or delete information when necessary? *(Consult IT as necessary)*	☐	Yes	☐
	☐	No, please give details:	
	☐	Notes can be added to the system where accuracy is disputed	
	☐	N/A	
6. Storage Limitation / Records Management			
How long will the information be kept for? (retention period)			☐
Are you procuring a system that will allow you to delete information in line with your retention periods? *(Consult IT as necessary)*	☐	Yes	☐
	☐	No, if no why not?	
	☐	N/A	
What method will be used, to securely destroy paper and/or electronic records? *(Consult IT/processor as necessary)*			☐
Will destruction be certificated or added to a destruction log?	☐	Yes, please specify:	☐
	☐	No, if no why not?	
Where will information be stored/accessed?	Choose an item.		☐
	Other (specify):		

Privacy Issue	Comments		Is there a risk? Address in Part Three
If you are using a 'Cloud Based' system to store or transfer information, where is the geographical location of the server/s? *(you may need to ask your provider to supply this)*			☐
If back up information is stored off-site, where is the geographical location?			☐
7. Security			
Who will have access to the information within the organisation?	Roles:		☐
What controls have been put in place to limit access to the information?			☐
If you are implementing a new system, does this system have the ability to audit access (audit trails)?	☐	Yes	☐
	☐	No	
	☐	N/A	
Does your new system/hardware/procedure provide adequate protection against security risks? Please detail. *(Consult IT as necessary)*	*e.g. encryption, two factor authentication, lockable/fire proof storage/updated policies*		☐
Are staff undertaking any additional training to help use new systems/procedures? Will this include Data Protection training?	☐	Yes (please give details)	☐
	☐	No. If no why not?	
Is there a disaster recovery plan in place in case of equipment/software failure? *(you may need to ask your provider to supply this)*	☐	Yes	☐
	☐	No	

Privacy Issue	Comments		Is there a risk? Address in Part Three
8. Data Processors – Data Processors should be listed after part 2 of this form			
If you are using a data processor, how has the provider demonstrated an adequate level of information security? *(you may need to ask your provider to supply this)*			☐
If using a data processor, how has the provider demonstrated that they are compliant with the UK GDPR? *(you may need to ask your provider to supply this)*			☐
If using a data processor, do you have a written contract in place with the UK GDPR clauses?	☐	Yes (please attach)	☐
	☐	No	
	☐	N/A	
9. Information Sharing – Data Controllers should be listed after part 2 of this form			
What is the legal basis for sharing? *(Please speak with your DPO about this)*			☐
Is there a sharing agreement in place? *(Please speak with your DPO about this)*	☐	Yes (please attach)	☐
	☐	No. If no, why not?	
	☐	N/A	
Will you transfer information outside of the UK, where will this be?	☐	Yes, please specify where:	☐
	☐	No	
	☐	N/A	
How will information be transferred?	*e.g. email, post, secure file transfer*		☐

Privacy Issue	Comments		Is there a risk? Address in Part Three
10. Rights of the Data Subject			
How will you manage 'Subject Access Requests' or other requests regarding information rights? *(Rectification, erasure, objection, and restriction etc.)*			☐
If procuring a new system, will this allow you to fulfil the rights of the data subject mentioned above?	☐	Yes, detail as needed:	☐
	☐	No	
If the project involves automated decision making do you have a process in place to facilitate human intervention? Please detail.			☐
Will your data processing exclude individuals from using a service or from exercising any rights?	☐	Yes, detail as needed:	☐
	☐	No	
11. Accountability			
As a result of this project do you need to update any of the following?	☐	Information Asset Register	☐
	☐	Policies	
	☐	Procedures	
If needed, have you consulted relevant stakeholders/ICO? What was the outcome?	☐	Yes, who? Please add outcome details:	☐
	☐	No	

List any Data Controllers information will be shared with (if applicable):

Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	

List any Data Processors information will be processed by (if applicable):

Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	

Part Three – Risk Evaluation

Privacy Risks (from part two) *Describe source of risk and potential impact on individuals, compliance and school risks*	**Options to reduce or eliminate risk**	**Evaluation** Is the risk eliminated, reduced or accepted?

Part Four – Signatures and Review

This Data Protection Impact Assessment (DPIA) should be signed by the relevant Information Asset Owner. Should any risks be 'accepted' then consideration should be given to the school's Senior Information Risk Owner (SIRO) countersigning the DPIA if this is not the individual who has completed the DPIA. All DPIAs should be approved by the Data Protection Officer.

Information Asset Owner
Name:
Job Title:
Date: Click or tap to enter a date.
Signature:

Data Protection Officer
Name:
Job Title:
Date: Click or tap to enter a date.
Signature:

Senior Officer (if applicable)
Name:
Job Title:
Date: Click or tap to enter a date.
Signature:

REVIEW DATE: Click or tap to enter a date. *(Recommend annually)*