

Data Protection Impact Assessment Procedure

1. Scope

All projects that involve processing personal data, or any activities (both internal and external) that affect the processing of personal data and impact the privacy of data subjects are within the scope of this procedure and will be subject to a data protection impact assessment (DPIA).

2. Responsibilities

- 2.1 The Data Protection Officer is responsible for performing necessary checks on personal data to establish the need for conducting a DPIA.
- 2.2 The governing body, senior leadership team and Data Protection Officer are responsible for checking appropriate controls are implemented to migrate any risks identified as part of the DPIA process and subsequent decision to proceed with the processing.
- 2.3 The risk owners are responsible for implementing any privacy risk solutions identified.

3. Procedure

- 3.1 The Data Protection Officer, Information Security Manager and all relevant project managers identify the need for a DPIA at the start of each project, assessing the project and type of personal data involved, or processing activity, against the screening questions set out in the DPIA tool.
- 3.2 Using the criteria below, following the likelihood and impact matrix, Canterbury Cross Primary School defines the risks to rights and freedoms of data subjects.

Likelihood and impact matrix:

Likelihood	3	0	3	6	9
	2	0	2	4	6
	1	0	1	2	3
		0	1	2	3
		Impact			



Where bright futures begin...

Risks to rights and freedoms of data subjects:

Risk Level	From	To	GDPR Assessment
High	6	9	Highest unacceptable risk
Medium	3	5	Unacceptable risk
Low	1	2	Acceptable risk
Zero	0	0	No risk

4. Data processing workbook (data flow)

- 4.1 Canterbury Cross Primary School records key information about all personal data processed for each project in the DPIA Tool Workbook. This includes a description of the processing and purposes; legitimate interests pursued by the controller; an assessment of the necessity and proportionality of the processing; an assessment of the risks to the rights and freedoms of data subjects (as per the matrix and risk level definitions).
- 4.2 Canterbury Cross Primary School captures the type of processing activity associated with the personal data being processed as part of the project in the DPIA Tool Workbook. These are categorised as:
 - Collection
 - Transmission
 - Storage
 - Access
 - Deletion
- 4.3 Canterbury Cross Primary School establishes on what lawful basis the data is being processed and appropriate retention period, in line with the Records Retention Policy
- 4.4 Canterbury Cross Primary School identifies the category of data processed, whether it is personal, special or that of a child's, and the format of the data.
- 4.5 Canterbury Cross Primary School identifies who has access to the data (individuals, teams, third parties and/or data processor) or who are involved in the processing of personal data, or processing activity, recording the geographic location of where the processing takes place if it is trans-border processing.

5. Identify privacy risks

- 5.1 Canterbury Cross Primary School assesses the privacy risks for each process activity.

- 5.1.1 Identifying and describing the privacy risk associated to that process activity
 - 5.1.2 Using the likelihood criteria (1 - low, 2 - medium, 3 - high), scoring the likelihood of the risk occurring.
 - 5.1.3 Using the impact criteria (0 - zero impact, 1 - low impact, 2 - medium impact, 3 - high impact) of the risk should it occur.
 - 5.1.4 Producing a calculated risk, identifying the risk to the rights and freedoms of data subjects.
 - 5.2 In assessing the privacy risks, Canterbury Cross Primary School considers: risks to the rights and freedoms of natural persons resulting from the processing of personal data; risks to the business (including reputational damage) and its objectives and obligations (both regulatory and contractual).
 - 5.3 Canterbury Cross Primary School identifies solutions to privacy risks, assigns a risk treatment owner and sets a target date for completion.
 - 5.4 Canterbury Cross Primary School priorities analysed risks for risk treatment based on the risk level criteria.
 - 5.5 Canterbury Cross Primary School's risk owner, in consultation with Data Protection Officer, approves and signs off each DPIA for each data processing activity.
6. Prior consultation
- 6.1 Where the DPIA identifies that processing of personal data will result in high risk to the data subject, in the absence of risk mitigating measures and controls, Canterbury Cross Primary School consults with the ICO prior to commencing processing.
 - 6.2 When Canterbury Cross Primary School requests consultation from the ICO it provides the following information:
 - 6.2.1 Detail of the responsibilities of Canterbury Cross Primary School and any associated data processors or joint controllers involved in the processing.
 - 6.2.2 Purpose of the intended processing.
 - 6.2.3 Detail of any/all measures and controls in place/provided to protect the rights and freedoms of the data subject.
 - 6.2.4 Contact details of the Data Protection Officer.
 - 6.2.5 A copy of the data protection impact assessment.
 - 6.2.6 Any other information requested by the ICO.

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above. A current version of this document is available to all members of staff.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
001		Canterbury Cross Primary School	