PIA Process and guide for schools

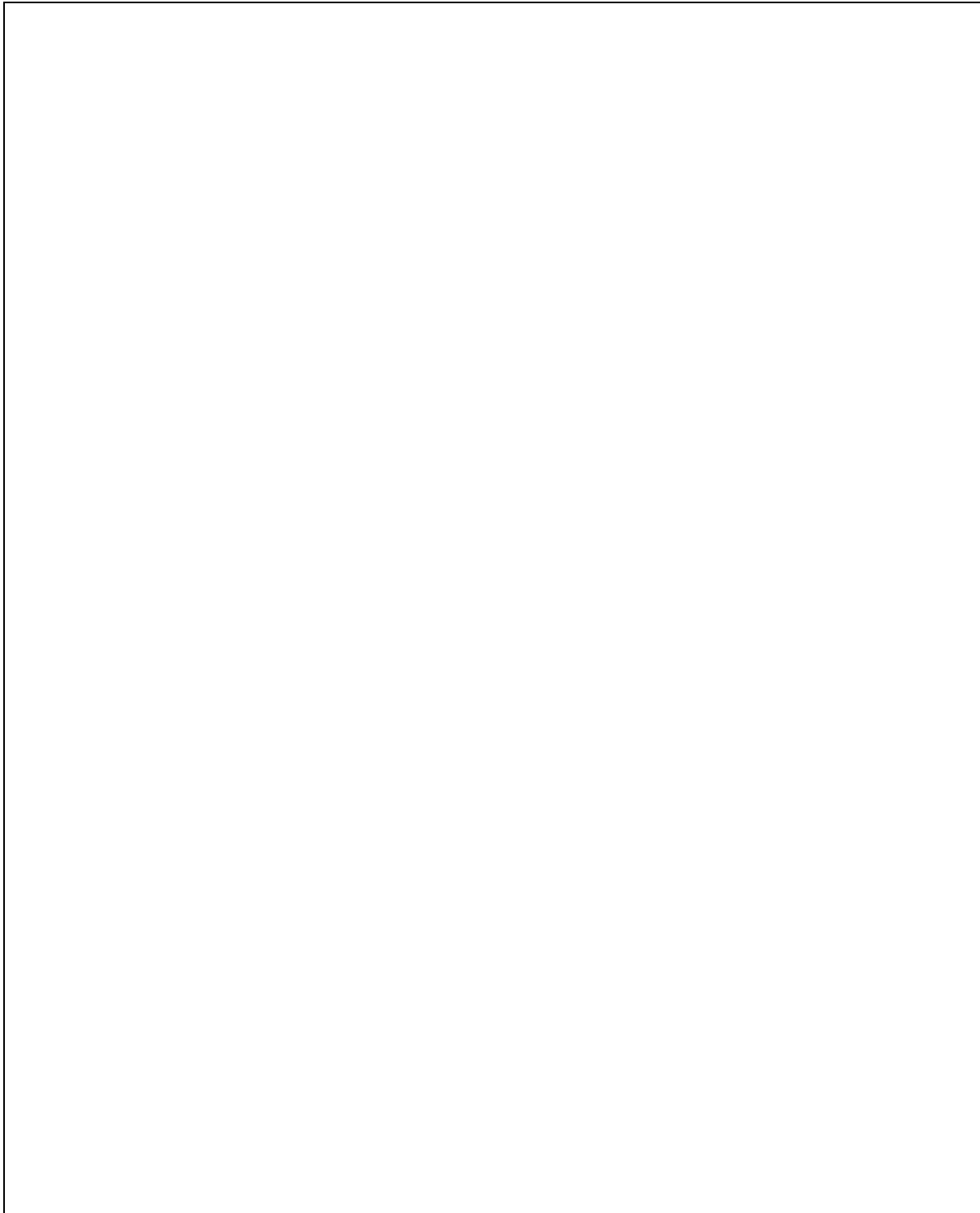**Screening questions to assess if a PIA is required**

If the answer is yes to any of the questions below, then using a PIA may be useful.

- Will the project involve the collection of new information about individuals?
- Will the project compel individuals to provide information about themselves?
- Will information about individuals be disclosed to organisations or people who have not previously had routine access to this information?
- Are you using the information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
- Does the project involve using new technology which might be perceived as being privacy intrusive?
- Will the project result in the school making decisions or taking action against individuals in ways which can have a significant impact on them?
- Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, use of special category data within GDPR.
- Will the project require you to contact individuals in ways which they may find intrusive?

<u>Step one: Identify the need for a PIA - Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.</u>

You may find it helpful to link to other relevant documents related to the project, for example a project proposal.

Also summarise why the need for a PIA was identified (this can draw on your answers to the screening questions).
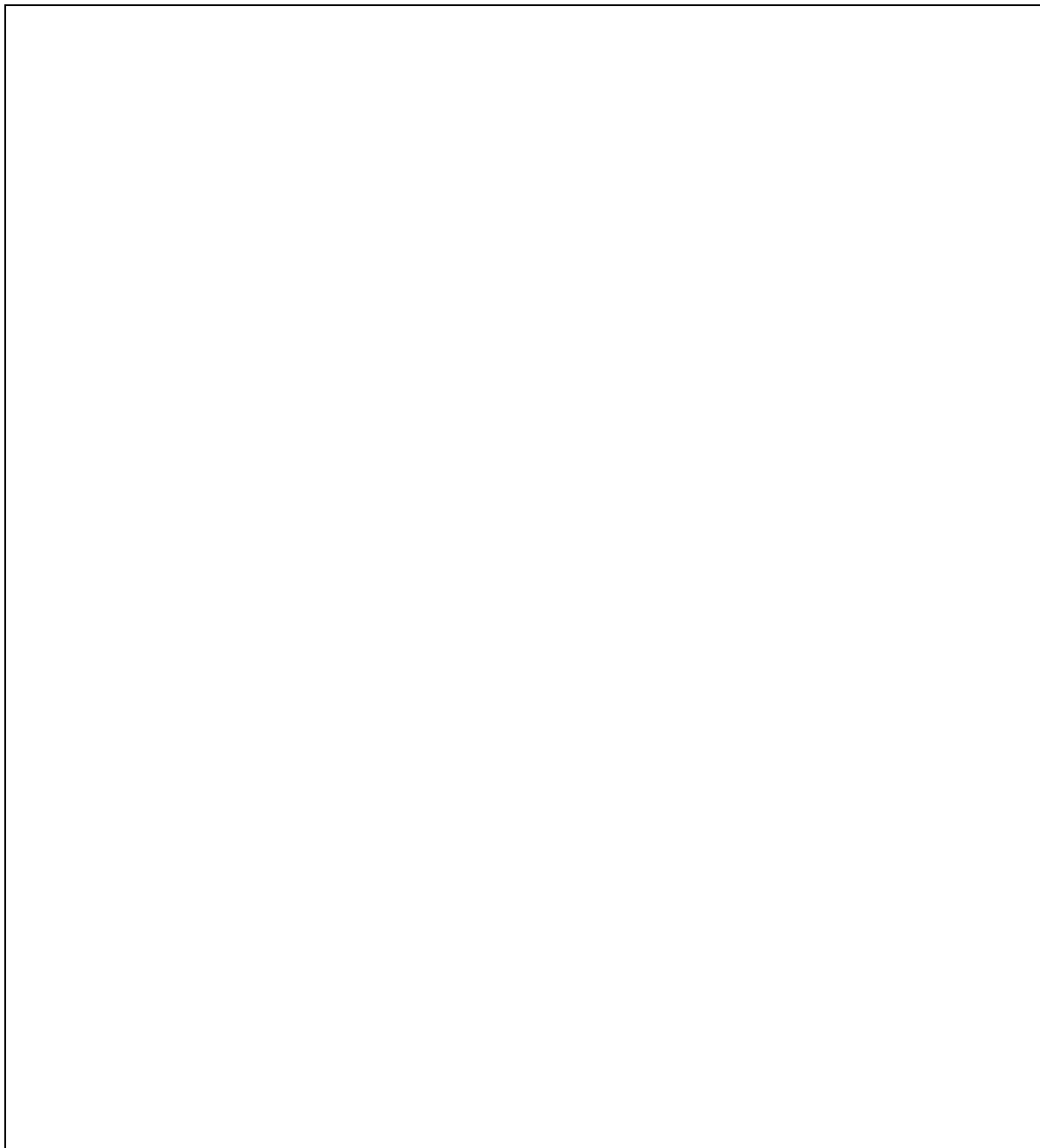
Data Flow

- How is the information collected?
- How is the information stored?
- How is the information used?
- How is the information deleted?

Step two: Describe the information flows

The collection, use and deletion of personal data should be described here, and it may also be useful to refer to a flow diagram or another way of explaining data flows. You should also say how many individuals are likely to be affected by the project.

Privacy Risks

- Are there any privacy risks to individuals?
- Are there any compliance risks to the school, such as fines for non-compliance?
- Are there any school level risks?

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out the consultation? You should link this to the relevant stages of your project management process.

Consultation can be used at any stage of the PIA process.

Step three: identify the privacy and related risks

Identify the key privacy risks and the associated compliance and corporate risks. Larger-scale PIAs might record this information on a more formal risk register.

Privacy Issue	Risk to individuals	Compliance Risk	Associated organisation/corporate risk

Step four: Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

Risk	Solution	Result – Risk has been eliminated/reduced, or accepted	Evaluation – Is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?

Step five: Sign off and record the PIA outcomes

Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Risk	Approved Solution	Approved by

Step six: Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns which may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action