



Data Protection Impact Assessment (DPIA) Policy

Document Control Information	
Document Title	Data Protection Impact Assessment (DPIA) Policy
Organisation / Site	New Bridge Multi Academy Trust
Review Period :	Every 2 years
Document Owner and Reviewer:	Director Operations
Approval Committee	Trustees

Revision and Approval History					
Author	Summary of changes	Issue	Date Applicable From	Approved by	Date of Next Review
R Righini	New policy	1	10 th June 2015	Trustees	10/06/2017
R Righini	Policy review no changes	2	31 st August 2017	Trustees	31.08/2019
R Righini	Policy review re new GDPR rules	3	28 th May 2018	Trustees	28/05/2020
R Righini	Doc review no changes	4	01/09/2020	n/a	31/08/2022
R Righini	Doc review minimal changes to reflect EU changes	5	01/12/2022	n/a	30/11//2024

Equality Impact	
Statement	<p>We welcome feedback on this document and the way it operates. We are interested to know of any possible or actual adverse impact that may affect any groups in respect of any of the equalities act 2010 protected characteristics.</p> <p>The person responsible for equality impact assessment for this document is the Director of Equality and Diversity.</p>
Screening	<p>This document has been screened by the Equality Team and the impact has been assessed as:</p> <p> <input type="checkbox"/> Not applicable <input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High </p>



Equality Impact Assessment Form

To be completed by document author / lead person

Title of document		Data Protection Impact Assessment (DPIA) Policy			
Organisation / Site	New Bridge Multi Academy Trust	Person completing form	Rita Righini	Date	01/12/2022
Does the process affect one group less or more favourably than another on the basis of:					Yes / No
Age refers to a person belonging to a particular age					No
Disability A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.					No
Gender reassignment The process of transitioning from one gender to another.					No
Marriage and civil partnership Marriage and civil partnership means someone who is legally married or in a civil partnership. Marriage can either be between a man and a woman, or between partners of the same sex. Civil partnership is between partners of the same sex.					No
Pregnancy and maternity Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding					No
Race Race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport. Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race.					No
Religion and belief Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.					No
Sex A man or a woman.					No
Sexual orientation Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.					No
If you have identified potential discrimination, please explain how the exception is valid, legal and/or justified? enter					

To be completed by EIA Lead

If potential discrimination has been identified, are the exceptions valid, legal and/or justified?		N/A
Does this policy / service / procedure need adjusting to remove any disadvantage identified or to better promote equality?		No
Impact Assessment Result (See tool below)	Low impact	
Date assessed.	01/12/2022	
High Impact The policy or process has a major impact on equality	Medium Impact The policy or process has an impact on equality	Low Impact The policy or process might have an impact on equality
There is significant potential for, or evidence of adverse impact.	There is some evidence to suggest potential for, or evidence of adverse impact.	There is little evidence to suggest that the policy could result in adverse impact
The policy has consequences for or affects significant numbers of people	The policy has consequences for or affects some people	The policy has consequences for or affects few people



1. Purpose

- 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 of Policy

- 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,
 - 2.1.1. Pupils and their families
 - 2.1.2. current, past, prospective employees
 - 2.1.3. clients and customers
 - 2.1.4. contractors and suppliers
 - 2.1.5. 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:
 - 2.5.1. 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;



- 2.5.2. 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
- 2.5.3. a systematic monitoring of a publicly accessible area on a large scale.

3. Aim(s)

- 3.1. We aim for all stakeholders to have an informed knowledge of the ways in which the MAT uses and processes data. In addition, we aim for all data users to be sufficiently informed about what information can and cannot be lawfully processed and shared.

4. Policy

- 4.1. 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.
- 4.2. The DPIA screening questionnaire will be able to identify when a DPIA is required/and or appropriate.
- 4.3. 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.
- 4.4. To be effective the DPIA screening/document needs to be completed at the early planning stages of new projects/initiatives involving personal data.

5. Sources and references

- 5.1. Data Protection Act 2018,
- 5.2. UK General Data Protection Regulation 2016 (UKGDPR).

6. Other useful documents

- 6.1. Subject Access Request Policy
- 6.2. Freedom of Information Policy
- 6.3. Privacy Notice Policy
- 6.4. Equality Policy
- 6.5. Publication Scheme
- 6.6. Complaints Policy
- 6.7. Data Protection Policy

7. Monitoring

- 7.1. This policy will be monitored through the MAT's accountability framework.
- 7.2. An assessment of compliance with requirements will be undertaken in order to provide:
 - 7.2.1. Assurance
 - 7.2.2. Gap analysis of policy and practice
 - 7.2.3. Examples of best practice
 - 7.2.4. Improvement and training plans
- 7.3. Reports will be submitted to the Governing Body / Trust Board.

