

Submitting controller details	
Name of controller	Kingsway Primary School
Reason for DPIA	Student special category information removed from site
Name of DPO	Daniel Parker - GCC
Project description	
Explain broadly what project aims to achieve and what type of processing it involves.	
<p>This DPIA will review the different types of personal data taken off-site for school trips and visits, assess the risks of the information being accessed by unauthorised persons or lost and suggest ways to reduce all processes to low or minimal risk.</p> <p>This DPIA is relevant for any additional copies of information removed from site.</p>	
Processing	
About the handling of the data -How will you collect, use, share, store and delete data?	
<p>Data will be copied directly from the school MIS. Additional requests for further information relating to health, safety & welfare may be also collected from parents, especially when activities include overnight, or other specific hazardous activities.</p> <p>Storage of this information will be within the MIS with copies being made available via School reception and paper and / or hard copy file for the purpose of being accessible while on trip.</p> <p>Sharing of the data will be restricted to staff members responsible for the welfare of the pupils, or those undertaking administrative duties relating to the activities.</p> <p>It is not anticipated that this will be shared further unless for the purpose of vital interest in the event of an emergency, or unless care of the child is transferred to another professional for the purpose of the activity or visit.</p> <p>All copies of the data removed from site will be returned by the party leader for secure destruction in school once the activity has been completed. In the event of a serious event on the trip, records may be kept in line with the retention schedule as part of any injury reporting records.</p>	
About the data – quantity of data, timeframe, and type. reference special category data.	
<p>Data will contain special category data, potentially relating to health, diet, and emergency contacts or doctors. In the event of a child having an identified serious illness / concern prior to the trip / visit. Information included in the event information pack may be substantial and contain significant details about any control measures and or medication needed. The information is expected to only be held outside of the school MIS for a duration that is not significantly longer than the trip itself.</p>	
About the data subjects – Expectations and control? Reference vulnerable groups and existing concerns over current processing?	
<p>Both data subjects and parents will have the expectation that any health and welfare information will be used and shared as appropriate in order to protect and care for the child. While similar information will be collected for all individuals, there is an expectation that the amount of data required for those with previously identified need will be greater, therefore this group have a higher level of vulnerability than others.</p> <p>Previously identified concerns include:</p> <ul style="list-style-type: none"> -over-sharing of information with others - Loss of remote copies of information - Copies of information being accessible by others not requiring information 	
Identify benefits of the processing?	
Processing is essential to protect the vital interests of all individuals involved in the event or trip.	
Consultation	
How will you consult with relevant stakeholders: or why not appropriate?	
<p>Consultation is not necessary in this circumstance. EVC guidelines will be followed, along with any advice and guidance provided by other security experts including but not limited to the ICO, DFE and the Local Authority. The DPO will also provide guidance where appropriate.</p>	
Compliance consideration	
Describe compliance and proportionality measures?	
<p>Processing will fall under the legal umbrella of public task and vital interest. Processing will fulfil the objectives set. There are no other mechanisms that can be used to ensure access to all information in the event of a technological failure.</p>	

Some other actions may be taken to reduce the need to refer to copied data in files, but these will not apply in all circumstances. Therefore, this activity is essential.
To ensure all copies of information are processed and destroyed effectively mechanism must exist to check producing data files and destruction.

Assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm L/M/H	Severity of harm L/M/H	Overall risk L/M/H
Risk includes thought to incorrect, loss, or omissions in information			
Dietary needs	M	H	H
Health records	H	H	H
SEND records	M	M	M
Contact information including	L	L	L
Doctors information	L	L	L

Measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Risk Eliminated, Reduced, Accepted.	Residual risk L/M/H	Measure approved Yes / No
Information required for the trip visit incomplete, inaccurate or containing omissions	Communication with parents for trips and visits to include collection of information for the purpose of safeguarding, welfare and health. Checks to ensure information correct on MIS	Reduced	Low	Yes
Trip file lost during activities	<ul style="list-style-type: none"> -Designated members of staff nominated for keeping files safe. -School process in communicated and followed by staff -Trip information files prepared by administration team and logged out and when returned for destruction -File integrity checked at agreed intervals during trip or during any moment of change of setting e.g. a move off a bus -Due diligence checks on all service suppliers 	Reduced	Low	Yes

File accessed by those not authorised	File to be in the control / possession of the nominated persons at all times. If appropriate and possible e.g. in a hotel / hostel, under lock and key	Reduced	Low	Yes
Over sharing of information with trip providers	Clear protocols understood and training for staff, to ensure they maintain integrity of information unless for the purpose of vital interest Contract checks to take place with providers requesting information and an assessment made to the need for sharing In the event of a decision to not share, all staff on visit to be made aware of this decision	Reduced	Low	Yes

Sign off		
Item	Name/position/date	Notes
Measures approved by:	Lee Pajak – Headteacher – 29.6.20	Note actions and responsibilities for compliance with DPIA
Residual risks approved by:	Dan Cox – Educational Visits Coordinator – 29.6.20	Consult with ICO before going ahead if High risk remains
DPO advice provided:	SchoolPro TLC	
<p>DPO advice: Ensure that all staff involved in running trips (or attending trips) are aware of the procedures around the handling of data when offsite.</p>		
DPO advice accepted or overruled:	Accepted.	If overruled, give reasons
Comments:		
Consultation responses reviewed by:	Dan Cox – with staff 29.6.20	If decision making is not in line with consultation, give reasons
Comments:		
This DPIA will kept under review by:	Lee Pajak	Annual
Additional Notes:		