UK GDPR Impact Assessment

Manor Teaching School Hub

Date: July 2024

Data Protection Impact Assessment

How to use this document:

Use it to conduct a data protection impact assessment (DPIA) by:

> Identifying the need for a DPIA

> Describing the data processing in more detail

> Consulting with stakeholders

> Assessing necessity and proportionality

> Identifying and assessing risks

> Identifying measures to reduce risk

> Signing off and recording outcomes

We've included prompts to help you fill in each section, and examples highlighted in yellow.

STEP 1: IDENTIFY THE NEED FOR A DPIA	
Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.	The need for the DPIA is to ensure that all parties that are part of the Manor Teaching School Hub are processing and storing personal details of any persons related to the work of the MTSH securely and transparently. MTSH was established in 2021 under the designation of Manor Primary School but under Manor Multi Academy Trust. All policies and Data Protection procedures would therefore follow under this. The identified venues are: Manor Primary School Barr Beacon St Bartholomew's CofE Primary Albright Education South Staffordshire learning Partnership Other schools associated to the programmes could also be used at some stage in the future.

STEP 2: DESCRIBE THE DATA PROCESSING IN MORE DETAIL

NATURE OF THE DATA PROCESSING

How will you collect, use, store and delete the data? What is the source of the data?	Vast majority of information containing personal details in the first instance is coming in via ldarby@manorteachingschoolhub.com emarson@manorteachingschoolhub.com or info@manorteachingschoolhub.com Office 365 account. This could be in the form of email and / or Forms
What types of processing are involved that can be identified as potentially high risk?	**ECT Manager** is an electronic web system that involves individuals submitting work / information. Includes personal details of individuals (includes Teacher Reference Number, DoB). Teaching Regulation Agency, integrates with ECT Manager. **Privacy Policy and Data Protection Policy copies required. **Current Access** Louise Wedge (Manor Teaching School Hub) Ceri Porter (Manor Teaching School Hub) Liz Marson (Manor Teaching School Hub) Lesley Darby (Manor Teaching School Hub) Administration purposes for maintaining records during the course of their Training using MTSH services and with providers. The data of individuals will be shared with providers of the courses such as: Ambition Institute DFE (Teaching Regulation Agency) Barr Beacon SCITT ** To obtain copies of their Privacy Notice and DP Policy

SCOPE

What is the nature of the data, and does it include special category or criminal offence data?	General Personal Details – Name, Email, School, DoB, Teacher Reference Number and contact number. Could be work or personal. No criminal information (DBS)
How much data will you be collecting and using?	Data will come onboard when people subscribe to services.
How often?	People will subscribe at different times during the year.

How long will you keep it?	Details will be kept on record for 2 years minimum. Upon a person leaving there is an automatic deletion.
How many individuals are affected?	6 Years for ECT Manager
	This applies to all individuals on the systems.
What geographical area does it cover?	Wolverhampton, Walsall & South Staffordshire, WM8 and other local regions.

CONTEXT	
What is the nature of your relationship with the individuals?	MTSH is a service provider and relationship manager between lead providers and the people as participants.
Do they include children or other vulnerable groups?	They do not include children or vulnerable groups.
How much control will they have over the processing?	The individuals would only provide the required data to enter on to the courses required.
Would they expect you to use their data in this way?	They would expect us to have the specific details as a requirement of enrolling to MTSH
Have there been prior concerns or previous security flaws to do with this type of processing?	To our knowledge we are unaware of any security issues current or historic with the systems in place.
Is it novel in any way?	These are systems that have been supplied by the providers in recent times and established.
What is the current state of technology in this area and are there any current issues of public concern that you should factor in?	No issues to mention in terms of technology used.

PURPOSES	
What do you want to achieve? What is the intended effect on individuals?	Our goal is to ensure that all service users of MTSH are able to achieve their induction, course goals, qualifications or CPD. Schools receive access to the best available CPD in the area utilising the Golden Thread in line with DFE objectives.
	Individuals will gain extended knowledge, certification which enables them to further their career within Education.
What are the benefits of the processing for you, and more broadly?	Processing these details enables us to ensure we have the right information to help the individuals achieve the best possible outcomes during their time with MTSH.

STEP 3: CONSULTATION PROCESS

Explain how you will consult with relevant stakeholders

When and how will you seek individuals' views on your data processing activity?	MTSH are able to state data processing activity through the publicly available Privacy Policy that individuals can read. We would field any queries resulting from this. Categories are stated on the Privacy Policies of the type of details we require.
If you feel it's not appropriate to consult with relevant stakeholders, how can you justify this decision? (Make sure you always record any decision not to consult)	There is limited information we MUST have to ensure we can fulfill their subscription.
If you are consulting, who else within your organisation do you need to involve?	All stakeholders are made aware and regular meetings take place which would include the discussion around systems used. Policies and Agreements are shared and approved at the committee meetings which is minuted and documented. Copies of all parties Data Protection Policy and Privacy Notices are kept with the MTSH administration for reference purposes.
Do you need any of your data processors or any other third parties to help with the consultation?	All parties will need to declare their own DPO's information. To collate that information. NB to email.
Do you plan to consult information security experts, or any other experts?	Currently no security experts are involved. Systems are fairly contained within the environment we operate.

STEP 4: ASSESS NECESSITY AND PROPORTIONALITY

Describe how you will make sure you comply with data protection law, and keep the processing proportionate to what you actually need

What is your lawful basis for processing the data in this way?	We operate within the DFE guidelines for the remit of Teaching School Hubs. Any information we obtain will be used accordingly and processed to ensure maximum effect for the organisation and the service users. We would not ask for anything else out the remit required.
Does the processing actually achieve your purpose?	The purpose is achieved.
Is there a less intrusive way to achieve the same outcome?	As above all details obtained are required to ensure full delivery and working partnerships to achieve the outcome required.
How will you ensure the data is good quality and limited to what is necessary?	Concise form used with specific request. Templated email asking specific information. Encrypted email approach when containing personal information.
What information will you give individuals about how their data is used?	Information, privacy notices and relevant documents such as Data Protection Policy will be publicly available and given to service users within an induction pack.

STEP 4: ASSESS NECESSITY AND PROPORTIONALITY

How will you help to support their rights under the UK GDPR? What measures do you take to ensure processors and other third parties comply with data protection law? How do you safeguard any international transfers of the data?	Individuals have the right to ask for the personal information held and MTSH would respond accordingly when requested. We would always comply with the individuals rights.

STEP 5: IDENTIFY AND ASSESS RISKS

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm (remote, possible or probable)	Severity of harm (minimal, significant or severe)	Overall risk (low, medium or high)
Risks may include: • A privacy breach caused by technical issues or human error, where individuals are at risk of discrimination, identity theft, fraud, loss of confidentiality, reputational damage, physical or emotional harm	Possible	Significant	LOW
	Possible	Disclosure of Salaries	LOW
• Poor processes or inadequate due diligence leading to non-compliance with the UK GDPR, resulting in financial or reputational damage to the school	Possible	Significant Working from home	LOW
Manual / Printed Files locations of secure storage across multiple sites potentially. Think and work more digital and securely sharing. Shred copies when no longer needed. Reduce storage access to files and record who has access.	Possible	Significant	MEDIUM

STEP 5: IDENTIFY AND ASSESS RISKS

STEP 6: IDENTIFY MEASURES TO REDUCE RISK

For risks identified as medium or high, identify additional measures you will take to reduce or eliminate the risk

Risk	Options to reduce or eliminate risk	Effect on risk (eliminated, reduced or accepted)	Residual risk (low, medium or high)	Measure approved (yes or no)
Multiple Organisations involved. To ensure consistency whilst working with MTSH and to ensure no crossover or confusion.	Annual Training Overview of Data Protection applying to MTSH Policy & Agreements	Reduced	Low	Yes
ECT Manager	2FA To enable if possible	Reduced	Low	Yes (to investigate)

STEP 7: SIGN OFF AND RECORD OUTCOMES

	Name, position and date	Actions
Measures approved by:	Lesley Darby	Integrate actions back into project plan, with date and responsibility for completion

Residual risks approved by:	Neil Beards (MAT DPO)	If accepting any residual risk, consult the ICO before going ahead with the project
DPO advice provided:	Training Required for all working within Manor Teaching School Hub. Copies of all Data Protection Policies for each organisation and contact details for each associated DPO for the organisations involved. ECT Manager, 2FA To enable if possible Enable 2FA on other systems used Office 365 – 2FA Enabled on associated accounts Working at home policy to be authorised to allow safe / secure working as well as storage of paperwork and devices whilst not in the workplace.	DPO should advise on compliance, step 6 measures and whether processing can proceed 3rd Party Systems (2FA investigate and obtain copies of their Data Privacy & Security) Box Canva Steplab Ambition Institute ECT Manager Best Practice Network Bookwhen

Summary of DPO advice:

There are some specific actions required to ensure compliance and we need to obtain all contracting partners and strategic partners own local Data Protection Policies as a reference and Privacy Notices.

To arrange MTSH training to go through the document and ensure UK GDPR is compliant with current working practices and elevate thoughts and accuracy whilst working with personal data.

Encryption of emails with personal information being transferred as well as 2 Factor Authentication being enabled for all systems used by people with access to personal information.

Focus on digital information but consideration for manual security within multiple premises must be considered and reviewed. Where are manual / printed files being stored and who has access to these? Will they be destroyed securely when they should be?

DPO advice accepted or overruled by:	
If the advice was overruled, explain why:	
Consultation responses reviewed by:	