

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

Special Schools Area Planning Framework

DPIA SCREENING REPORT TEMPLATE

Project Name:

Special Schools Area Plan Framework

1. PROJECT SUMMARY

The Special Schools Area Plan Framework sets out the Education Authority's (EA) vision, rationale and delivery framework with regards to area planning for special schools across Northern Ireland. It sets out the rationale for why change is needed along with the vision and guiding principles for special school provision in the future.

The Framework also develops criteria and indicators to evaluate our special school estate in order to identify need and make suitable provision for future needs of children and young people with special educational needs.

The EA is seeking to provide pupils and parents with a greater level of consistency in special school provision across the region. This approach will reduce the need for pupils with the most severe and complex needs to experience the uncertainty and anxiety associated with multiple transitions during their school life.

In seeking to deliver a greater level of consistency the EA wants to:

1. improve outcomes for children attending special schools;
2. ensure we have the capacity to meet current and projected demand for places within special schools working with the relevant policy leads within DE to help inform future capital investment;
3. create a regionally consistent model of delivery to enable the Health and Social Care Trusts to develop a consistent model of therapy intervention; and
4. work with Health and Social Care Trusts to ensure there is a consistent, integrated and tiered model of support that addresses the assessed needs of children based on risk stratification within the special school sector.

5. STAKEHOLDERS

The main stakeholders impacted by the Framework include –

- Children and young people with special educational needs and their families;
- Staff in special schools; school leaders including Boards of Governors and Principals; teachers; support staff and other ancillary staff in schools
- Other EA staff, in particular staff in the following units/departments – CYPS Directorate including special education, psychology and pupil support services; Education Directorate; Operations and Estates Directorate including Transport in particular;
- CCMS and other sectoral bodies;
- External partners including Health and Social Care Trusts and voluntary groups

6. BRIEF DESCRIPTION OF PERSONAL DATA INVOLVED

The Framework itself does not involve the collection of any personal data. The associated consultation exercise collects minimal personal information as set out below all of which carries a negligible privacy risk.

- Respondent Category
 - o Parent/Guardian Pupil
 - o Principal Member of school staff
 - o Education/Sectoral support group Political representative
 - o Governor Board of Governors
 - o General public Other (please specify)
- Local government district area to which respondent's response refers
- School category which best represents respondent's interest
 - o Nursery/pre-school Primary
 - o Special Post primary
 - o Specialist provision primary Specialist provision post primary
 - o General interest Other (please specify)

7. PRIVACY ASSESSMENT

Use this checklist to assess the project for privacy risks. The questions below will help you consider whether a DPIA is necessary.

(i) Does the project/activity involve any of the following processing that automatically require a DPIA? ¹	Yes	No	If yes, explain your response
Any systematic and extensive evaluation of personal aspects relating to a person which is based on automated processing,	☐	☒	

¹ ICO website DPIAs for Organisations - [What types of processing automatically require a DPIA?](#)

including profiling, and on which decisions are based that produce legal effects concerning the person or similarly significantly affect the person			
Processing on a large scale of special categories of data or of personal data relating to criminal convictions and offences	☐	☒	
A systematic monitoring of a publicly accessible area on a large scale	☐	☒	
If you answer yes to any of the questions in section 4(i) above, a DPIA will be automatically required. Consult your Data Protection Officer for further advice.			
(ii) Does the project/activity involve any of the following that the ICO consider high risk processing?²	Yes	No	If yes, explain your response
Innovative Technology: Use innovative technology or novel use of existing technology (e.g. AI)	☐	☒	
Denial of Service: Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit	☐	☒	
Large-scale profiling: Carry out profiling on a large scale	☐	☒	
Biometric/Genetic data: Process biometric or genetic data	☐	☒	
Data Matching: Combine, compare or match data from multiple sources	☐	☒	
Invisible Processing: Process personal data without providing a privacy notice directly to the individual	☐	☒	
Tracking: Process personal data in a way that involves tracking individuals' online or offline location or behaviour	☐	☒	
Targeting of Children: Process children's personal data for profiling or automated decision-making or for marketing	☐	☒	

² ICO website DPIAs for Organisations– [Examples of processing “likely to result in high risk”](#)

purposes, or offer online services directly to them			
Risk of Physical Harm: Process personal data that could result in a risk of physical harm in the event of a security breach	☐	☒	
If you answer yes to any of the questions in section 4(ii) above, a DPIA will be automatically required. Consult your Data Protection Officer for further advice.			
(iii) Does the project involve any of the following?	Yes	No	If yes, explain your response
Information management			
A change to an existing policy, process or system that involves personal data (e.g. new legislation or policy that makes it compulsory to collect or disclose information).	☐	☒	
A change in location of a business area or branch (e.g. plans to centralise a service or an office move).	☐	☒	
A practice or activity that is listed on a risk register (e.g. activities listed on your business area's risk register or health and safety register).	☐	☒	
Collection			
Collecting new information about an individual (e.g. gathering information about individuals' location).	☐	☒	
A new way of gathering personal information (e.g. collecting information online rather than on paper forms).	☐	☒	
Storage, security and retention			
A change in the way personal information is stored or secured (e.g. cloud storage).	☐	☒	
A change to how sensitive personal information is managed (e.g. moving education records to a new database).	☐	☒	
Transferring personal information offshore (e.g. using a cloud based application to store data).	☐	☒	
A decision to retain personal information for longer than previously kept (e.g. keeping information for 10 years when you previously only held it for 7).	☐	☒	

Use or disclosure			
Using information classed as 'special category data' (e.g. information about an individual's health).	☐	☒	
Using personal data already held for a new purpose (e.g. to obtain customer profiles).	☐	☒	
Disclosing information to a third party (e.g. following a request from a law enforcement agency to provide information for a particular purpose).	☐	☒	
Sharing or matching personal information held by different organisations or in different datasets (e.g. combining data with other information held on systems or sharing information to enable organisations to provide services jointly).	☐	☒	
Individuals' access to their information			
A change in policy that results in people having less access to information that you hold about them (for example, archiving documents after 6 months into a facility from which they cannot be easily retrieved).	☐	☒	
Identifying individuals			
Establishing a new way of identifying individuals (for example, a unique identifier, a biometric, or online identity system).	☐	☒	
New intrusions on individuals' property, person or activities			
Introducing a new system for searching individuals' property, persons or premises (e.g. adopting a new policy of searching data on mobile phones that have been returned for upgrading).	☐	☒	
Surveillance, tracking or monitoring of movements, behaviour or communications (e.g. installing a new CCTV system or monitoring a member of staff's email account).	☐	☒	
Changes to premises impacting on private spaces where clients/staff may discuss personal data (e.g. changing the location of a reception desk).	☐	☒	

where people may disclose personal details or relocating a branch where sensitive personal data is processed).			
New regulatory requirements that could lead to compliance action against individuals on the basis of information about them (e.g. <i>adding a new medical condition to the requirements of a licence</i>).	☐	☒	
Other privacy intrusions such as body searches, or intrusion into physical space.	☐	☒	
If you answer yes to any of the questions in section 4(iii) above, a DPIA may be required or desirable. Consult your Data Protection Officer for further advice.			
Additional Comments/Notes			
The Framework itself does not involve the collection of any personal data. The associated consultation exercise collects minimal personal information as set out below all of which which carries a negligible privacy risk. • Respondent Category - o Parent/Guardian Pupil - o Principal Member of school staff - o Education/Sectoral support group Political representative - o Governor Board of Governors - o General public Other (please specify) • Local government district area to which respondent's response refers • School category which best represents respondent's interest - o Nursery/pre-school Primary - o Special Post primary - o Specialist provision primary Specialist provision post primary - o General interest Other (please specify) The Framework also indicates to respondents that “Unless individual respondents specifically indicate that they wish their response to be treated in confidence, their name and the nature of their response may be included in any published summary of responses. Respondents should also be aware that the Authority’s obligations under the Freedom of Information Act may require that any responses not subject to specific exemptions under the Act, be disclosed to other parties on request.” The Education Authority will publish a summary of responses following completion of the consultation process. All personal details, including names, email addresses, phone numbers etc. will be removed or redacted prior to publication of this summary.			

8. INITIAL RISK ASSESSMENT

If you answered 'Yes' to any of the questions in section 4, use the table below to give a rating - either Low (L), Medium (M), or High (H) – to each of the aspects of the project set out in the first column. If you answered 'No' to all the questions in section 4, move on to section 6.

Aspect of the Project	Rating (L, M or H)	
Level of personal data handling	L – Minimal personal information will be handled	☒
	M – A moderate amount of personal information (or information that could become personal information) will be handled	☐
	H – A significant amount of personal information (or information that could become personal information) will be handled	☐
Sensitivity of information	L – The information is not sensitive	☒
	M – The information may be considered to be, or may become, sensitive	☐
	H – The information is highly sensitive	☐
Significance of the changes	L – Only minor change to existing functions/activities	☒
	M – Substantial change to existing functions/activities; or a new initiative	☐
	H – Major overhaul of existing functions/activities; or a new initiative that's significantly different	☐
Interaction with third parties	L – No interaction with other agencies	☒
	M – Interaction with one or two other agencies	☐
	H – Extensive cross-agency (government) interaction or cross-sectional (non-government and government) interaction	☐

Public impact	L – Minimal impact on the organisation and individuals	☒
	M – Some impact on individuals is likely due to changes to the handling of personal information; or the changes may raise public concern	☐
	H – High impact on individuals and the wider public; concerns over aspects of project or negative media interest is likely.	☐
9. SUMMARY OF PRIVACY IMPACT		
The privacy impact for this project has been assessed as: * If you have assessed the privacy impact as medium or high, a DPIA must be carried out.		
Low – There is little or no personal information involved; or the use of personal information is uncontroversial; or the risk of harm eventuating is negligible; or the change is minor and something that the individuals concerned would expect; or risks are fully mitigated.		☒
Medium* – Some personal information is involved, and several low to medium risks have been identified		☐
High* – Sensitive personal information is involved, and several medium to high risks have been identified		☐
Reduced risk – The project will lessen existing privacy risks		☐
Inadequate information – More information and analysis is needed to fully assess the privacy impact of the project.		☐
Briefly summarise reasons for the rating given		
The privacy impact for this project has been assessed as low as there is little or no personal information involved and any risks are fully mitigated.		

10. RECOMMENDATION

A full data protection impact assessment **is** required

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A full data protection impact assessment **is not** required

☒**Reasons**

A full data protection impact assessment is not required as there is little or no personal information involved and any risks are fully mitigated.

11. SIGN OFF**[SENIOR RESPONSIBLE OFFICER]**

Name: Michael McConkey

Date: 14 October 2020

Signed:

[APPROVING OFFICER]

Name: Kim Scott

Date: 14 October 2020

Signed: