

RECOGNISE • **E**NCOURAGE • **S**TRIVE • **P**REPARE • **E**MPATHISE • **C**HRISTIAN • **T**EAMWORK



St Edward's
Church of England
Academy

Privacy Impact Assessments

Non Statutory



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The Vision for Education within a Church of England Academy

There are fundamental reasons, rooted in the Bible, which have motivated centuries of Christian involvement in schooling in this country and around the world. The God of all creation is concerned with everything related to education.

There is a fresh articulation of the Church of England's vision for education as we meet the challenges and take the opportunities offered by the present situation. It is not simply for Church schools but, recognising the Church of England's involvement in education over many centuries, seeks to promote educational excellence everywhere, for everyone. In Church schools like St Edward's Church of England Academy, the deeply Christian foundation for this vision will be seen explicitly in teaching and learning both in RE and across the curriculum, and also in the authentically Christian worship and ethos. The Church's vision for education can be expressed and promoted as one of human flourishing that inspires what the school is and does.

The vision is deeply Christian, with the promise by Jesus of 'life in all its fullness' at its heart. This vision embraces the spiritual, physical, intellectual, emotional, moral and social development of children and young people. We offer a vision of human flourishing for all, one that embraces excellence and academic rigour, but set them in a wider framework. This is worked out theologically and educationally through four basic elements which permeate our vision for education:

- Wisdom
- Hope
- Community
- Dignity

The vision, in line with the Church of England's role as the established Church, is for the common good of the whole human community and its environment, whether national, regional or local. It is hospitable to diversity, respects freedom of religion and belief, and encourages others to contribute from the depths of their own traditions and understandings. It invites collaboration, alliances, negotiation of differences, and the forming of new settlements in order to serve the flourishing of a healthily plural society and democracy, together with a healthily plural educational system.



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St Edward Church of England Ethos and Values

St Edward's Church of England Academy has a clear ethos and values that underpin all that it does which are based upon the teachings of Jesus Christ.

Our ethos and values are encompassed in the word **RESPECT**.

Each letter within this word hold further meaning and are central to what we believe our Academy and the community it serves stand for and strive to live out in as we fulfil the Academy motto:

'Learn for Life'

- **R**ecognise and **E**ncourage - everyone's potential, individual skills and talents
- **S**trive to be the best we can be
- **P**repare for the challenges of life
- **E**mpathise - promoting the values of respect, kindness, compassion, fairness, forgiveness, love, honesty and trust
- **C**hristian – a community where we learn from the teachings of Jesus so that we can contribute to the family of St Edward's and beyond
- **T**eamwork – an environment where we work together so we can all achieve our potential



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Privacy Impact Assessments (PIA)

Introduction

Privacy Impact Assessments are at the heart of Privacy by Design – an approach which allows privacy to be considered and built into any new projects which may involve personal or sensitive data. The assessment allows the St Edward's Church of England Academy to find and fix any problems in the development stages of a project. This can help to reduce costs and maintain reputation that may be hit down the line with a possible data incident.

If you are involved in a project which involves handling (collecting, using, disclosing, etc) larger quantities of personal data or sensitive data in a way which hasn't previously been done you should consider whether a Privacy Impact Assessment is required.

A Privacy Impact Assessment helps our organisation to identify potential privacy risks and find solutions to reduce or eliminate those risks early in the project saving time, money and reputational damage and reduce the likelihood of an individual experiencing damage and/or distress.

Acronyms and Definitions

ICO Information Commissioners Office

GDPR General Data Protection Regulations

PECR Privacy and Electronic Communications Regulation

DP Data Protection

Data Subject: Data Subject is the specific individual to which the personal data relates to.

Personal Data: Information which indirectly or directly identifies an identifiable natural person. For example, the information maybe a name, address, identification number, location data, online identifier. It may include factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of an individual.



Do I need one?

If personal/sensitive data is involved, a PIA should be started at the very start of a concept or project. It should be part of the normal processes involved when a project is in the development stages.

However, PIAs are not mandatory for every project involving personal data, the wording of the law states that they are only required when processing is:

‘likely to result in a high risk to the rights and freedoms of natural persons’ (Article 35(1)).

Criteria have been outlined by the Government Working Party for assessing what is regarded as high risk. This includes processing involving:

1. Evaluation or scoring, including profiling and predicting especially from aspects concerning the Data Subject’s performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements
2. Automated decision-making with legal or similar significant effects
3. Systematic monitoring of individuals, for example CCTV
4. Sensitive data
5. Personal Data processed on a large scale
6. Datasets that have been matched or combined
7. Data concerning vulnerable Data Subjects
8. Innovative use or application of technological or organisational solutions
9. Data transfers across borders outside the European Union
10. Data that Prevents Data Subjects from exercising a right or using a service or a contract



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Distinct examples of when a PIAs should be considered is also defined by law as being one of the following. These are examples, which should not be limited to. The ICO states that it would be good practice to complete a PIA outside of these examples too.

- systematic and extensive processing activities, including profiling and where decisions that have legal effects – or similarly significant effects – on individuals.
- large scale processing of special categories of data or personal data relating to criminal convictions or offences.
- systematic monitoring of public areas at a large scale (e.g. CCTV)
- Examples of projects where a PIA would need to be considered are:
- Development of a marketing campaign
- New ICT software where personal/sensitive data may be held
- Commissioning of a new service
- CCTV being used in public areas

Questions to be asked when completing an PIA:

How does it work?

How does Information Flow?

What are the risks?

What solutions can I put in place?

Who is responsible?



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