



## DPIA Project Information

**Title:**

SAI Policy and Procedure

**Project ID:**

430

**Project Timeframe for Data Collection:**

In less than 3 months

## DPIA Screening Questions

Question Number	Question	Answer
1	I understand that, by selecting Yes, I am confirming I am the project manager for the project or activity for which this DPIA screening tool is being carried out.	Yes
2	I understand that by ticking this box I am confirming that I have undertaken the Data Protection Essentials training module on delta.	Yes
3	Is this project a change to an existing process, or is it a new processing activity?	Change to an existing process
4	Has a DPIA for this been previously submitted?	No
5	If a DPIA was submitted - Was legal advice recommended?	No
6	When did the planning stage of this project begin?	02/09/2024
7	Is this screening tool for the use of a surveillance camera, including CCTV, dash cam and body worn cameras?	No
8	If Yes - Is this DPIA a proposal for a new deployment, or the expansion of an existing surveillance system?	
9	Which data protection regime will you be processing under?	UK GDPR
10	Please outline the project including the types of data, software, processors, and how the data will be used	Some pupils have medical conditions or disabilities which requires physical adaptations of school buildings to enable their attendance. Individual pupil's needs are identified, and the adjustment requires are specified and commissioned. The project relates to the process from identification to delivery of physical adaptations. The needs of the student are identified by the Specialist Teaching and Learning Service in KCC. Personal information will be used in line with data protection law as outlined in the SEND

Privacy Notice. This can be found at:  
<https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/education/sen>  
A PDF document is created showing facilities needed in the school. It is protected by a password so only the stake holders involved in the project can see details. The name is removed and only their medical condition is confirmed so Infrastructure can identify the works needed to make the school accessible. After this point KCC will look to get the works completed.

11 Within your project are you planning to:

12 Or are you planning to:

Carry out any processing which involves preventing data subjects from exercising a right or using a service or contract?

Process data concerning vulnerable data subjects?

Process sensitive data or data of a highly personal nature?

13 Additional Information

## DPIA Core Questions

Question Number	Question	Answer
1	What is your project aim?	To increase access to mainstream schools, where possible, for the new or potential student. Works would consist of ramps, widening doors etc. This will enable more children with disabilities to attend a school local to their home.
2	Are all of the categories of personal data identified in the data question necessary for you to achieve this aim?	KCC will collect basic data including the names, D.O.B, address and school of the pupil. This data is needed to identify the school, age and child for the application process.  The medical condition is also required so we can understand their needs then we can assess the access issues on site they will face. Contractors will not be given any identifiable data only medical need - i.e. an external ramp is needed for a wheelchair user to access the classroom.
3	What are the categories of data subjects whose data will be processed?	The Data subject is a new or existing student located at the school. The information is collected by Specialist Teaching and Learning services (STLS) who are a KCC internal team who liase with the Occupational therapist (OT) of the students. They create a password protected PDF/ documents confirming the issues the child will face in the school.
4	What is the nature of the relationship with the individual?	As a local authority, KCC is in a position of power compared to data subjects
5	Are there any other organisations other than KCC who will be involved in this project?	Processor
6	Please name the organisations and their roles.	Processors - Contractors for the works identified from our frame work will all have DBS or advanced DBS sign offs. Contractors will only be given a medical need in order to make recommendations. Contractors are instructed on an individual basis depending on works which are required. Infrastructure will liase with the Contractor for a specific project and will transfer data which is required by Outlook.

7	Tick to confirm which of the following you have in place with the organisations	<p>Article 28 compliant contract</p> <p>Other</p> <p>Contractors will only be given limited information such as school and works needed. Data will be transferred using Outlook. Contractors will have contracts with KCC which state GDPR processes.</p>
8	How will the personal data be collected?	Collected from the individual by another KCC team
9	How will the personal data be collected from the individual?	<p>Other</p> <p>STLS will collect from parents as well as the schools, nursery and occupational therapist . When the data subject/refer is asked to fill in the referral form, this is the information that is present on our referral form/ application form.</p>
10	Will the data be shared with:	<p>Other</p> <p>A different KCC team</p> <p>Your KCC team</p> <p>Data may be shared with consultants and contractors who can provide guidance for the type of works which will support the need of the student. A medical need may be shared with consultants or contractors but no identifiable information will be shared. For example a contractor will be told that an external wheelchair ramp is needed for a child to gain access to a classroom but not the medical condition for the child.</p>
11	Do you have a copy of the privacy notice that data subjects will be provided with at the point their data is collected?	Yes
12	Does the privacy notice state that data will be shared with your team for the purpose you will be using it for?	Yes
13	How will the data be shared with your team securely?	The Reports are shared to us through Outlook and saved to the relevant shared drive. There is a password on the document/ Teams assigned projects to stop all unauthorized parties from viewing the details.

14	What steps will you take to ensure the data you collect and/or use is accurate?	<p>The information is supplied from STLS who gather any appropriate information from parents/ guardian and relevant details from the school, nursery and occupational therapist who assists the child with getting an education. This information is as accurate as possible at the time of submission.</p> <p>The information supplied is for short term projects relating to the process of identification and delivery of physical adaptations of school buildings to enable attendance.</p> <p>If the pupils needs/ condition subsequent change a further application would be required.</p>
15	In what system(s) will the data be stored?	<p>Outlook</p> <p>Other</p> <p>Teams</p> <p>iCasework</p> <p>SharePoint</p> <p>OneDrive</p> <p>Data is stored on shared drive and password protected.</p> <p>Teams access is assigned to colleagues who are working on the project and will be locked to others not assigned.</p>
16	Where are the servers for the system(s) located?	UK
17	What is the current state of technology in this area?	This is tried and tested technology.
18	How will the security of the data be ensured when it is transferred outside of the UK?	<p>Not applicable, the data will only be stored on servers (including back-up servers) in the UK</p> <p>Information is stored in a KCC server which cannot be accessed unless special provisions are given and permission is gained. Also the document is password protected so access is only happening with who is involved</p>
19	How will the security of the data be ensured in transit and at rest?	Users will have different levels of access to ensure only people who need to access the data have access to it

		<p>There is an Article 28 compliant contract in place with the data processor</p> <p>ICT Compliance and Risk have carried out a technical risk assessment for the software we are using</p> <p>ICT Compliance and Risk have carried out a technical risk assessment</p> <p>The document can only be accessed if they have a password set up by STLS.</p>
20	Are there any prior concerns over this type of processing or any security flaws	No
21	Please tick to confirm the following statement is true:	I am assured that the personal data being processed in this project is protected in transit and at rest from unauthorised access and loss.
22	Describe how the personal data will be used to achieve your project aim	<p>The aim is to provide suitable adaptation/ adjustments to school building to accommodate the needs of pupils in a cost effective and timely manner so that they can attend school.</p> <p>The information collected will be used as part of an application process for works to make a school accessible for a student. The pupils information is used to ensure that the most suitable/ effective adjustments can be made.</p> <p>The address of the pupil can be used to determine if an alternative school has the required adaptations already and within a similar distance. If there is no suitable alternative provision an application for adaptations/ adjustments may be recommended.</p> <p>If the application is successful Infrastructure will plan and complete accessibility works to make the school accessible for the student.</p>
23	How long will the data be retained for?	<p>Specific retentions periods can be found: <a href="https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/integrated-childrens-services/disabled-children-and-young-peoples-service-privacy-notice2">https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/integrated-childrens-services/disabled-children-and-young-peoples-service-privacy-notice2</a>.</p> <p>STLS guidance shared with Education. All CYPs file will be kept from date of birth plus 25 years.</p>

24	Is the same retention period cited in all documentation?	No
25	At the end of the retention period will the data be:	Deleted
26	What processes do you have in place to ensure that the retention period is adhered to?	We will have a process in place to ensure we know when the retention period ends
27	Please tick to confirm the following statement is true	I am assured that there are adequate processes in place to ensure retention periods are adhered to, in line with the Article 5 principle of storage limitation in the UK GDPR
28	Is there a KCC privacy notice for this use of personal data?	There is a published KCC privacy notice for this use of personal data
29	Please link to the draft/ published privacy notice	<p>Privacy notice</p> <p><a href="https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/education/sen">https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/education/sen</a></p> <p><a href="https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/integrated-childrens-services/disabled-children-and-young-peoples-service-privacy-notice2">https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/integrated-childrens-services/disabled-children-and-young-peoples-service-privacy-notice2</a></p> <p>SEND Privacy Notice <a href="https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/education/sen">https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/education/sen</a></p>
30	Is there an easy read privacy notice for this use of personal data?	There is a published easy read privacy notice for this use of personal data
31	How will you ensure data subjects read the privacy notice and understand how their data will be used at the point of data collection?	<p>Other</p> <p>We will link to the privacy notice on our webpages</p> <p>When the data subject is asked to fill in the STLS referral form, this is the information that is present on our referral form.</p> <p>STLS Privacy Notice: To ensure that the STLS Sensory Service can support you and your child, either at home or in a pre-school setting or school, we may need to</p>



		<p>speak with other professionals. These may include: Teachers and School Professionals, Early Years Practitioners, Portage, Health Visitors, SEN Specialist Teachers, Educational Psychologists, Speech Therapists and Therapy Professionals, Audiologists, Audiovestibular and ENT Professionals, Optometrists, Orthoptists, Ophthalmologists, VI Clinic Liaison Professionals, Mobility Officers, Social Care and KCC SEN Officers.</p> <p>These professionals work together to ensure the best possible Special Education Needs and/or Disability services and provision are in place for your child. You will be provided with copies of any reports or assessments written by professionals regarding your child.</p> <p>Personal information will be used in line with data protection law as outlined in the SEND Privacy Notice. This can be found at: <a href="https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/education/sen">https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notice/education/sen</a></p> <p>STLS will recommend that schools visit Kelsi to access the appropriate Privacy Notice.</p>
32	How will you support data subject rights	<p>We will follow the KCC agreed policy for subject rights processes.</p> <p>We provide a privacy notice to the individual including an easy read (where appropriate) which explains subject rights and how they can exercise them.</p> <p>Staff are trained to recognise rights requests and we have a dedicated team who facilitate and deal with subject right requests.</p>
33	What measures will you put in place to prevent data being used beyond the purposes outlined in your privacy notice?	<p>Other</p> <p>Data will be saved in project specific folder and will not be used to identify patterns or manipulated. Teams will only be accessible to those who are assigned to that project and for the purposes of that project. Passwords will protect the files/documents in shared drives from being accessed by other users and prevent the data being used beyond the purposes outlined.</p>
34	Are there any current issues of public concern that you should factor in?	No

35	Consultation: Please summarise the responses of data subjects you have consulted with on the topic of this project.	The SAI Policy and Procedure was subject to public consultation between 23 September and 11 November 2024. Where appropriate the draft Policy and Procedure has been changed to reflect the consultation responses.
36	Consultation: ICT Compliance and Risk	None
37	Consultation: Please summarise the Caldicott Guardian's response and any recommendations	<p>Education has contacted Katherine Atkinson, Caldicott Guardian regarding the KCC consultations for the Education Accessibility Strategy and School Access Initiative Policy and Procedure.</p> <p>Response from Katherine Atkinson:</p> <p>"I have reviewed the documents to give me the background, and I have no concerns from a Caldicott Guardian perspective for your DPIA."</p>
38	Consultation : please summarise the responses and recommendations of any other individuals or organisations you have consulted with.	STLS recommend that we continue to use current process and safeguards. Information is collected by STLS from parents, nursery, school and occupational therapist. Information in pdf/ word documents is password projected and shared via Outlook.
39	Are you signed up to any approved code of conduct or certification scheme?	
40	When is the processing of personal data for this project due to begin?	In less than 3 months

## Data Collection

<b>Data Category</b>	<b>Data being Collected</b>
<b>Basic Data</b>	Name Date of birth Address Postcode
<b>Special Category Data</b>	Physical or mental health
<b>Criminal Offence Data (UK GDPR)</b>	No data is being collected under this category
<b>Criminal Offence Data (DPA Part 3)</b>	No data is being collected under this category
<b>Surveillance Camera</b>	No data is being collected under this category

## Data Collection Questions

Data Group	Question Number	Question	Answer
Special Category Data	1	Please identify the Article 9 basis being relied upon for the processing of special category data	(g) Necessary for substantial public interest (on the basis of a DPA 18 condition) and which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and interests of data subjects
Special Category Data	2	If you are relying on condition (a) please state which element of the project relies on explicit consent, and outline the process you have for collecting, recording, and withdrawing consent	This condition is not being relied upon.
Special Category Data	3	If you are relying on condition (b), (h), (i), and/or (j) you must also identify at least one of the additional conditions from Schedule 1, Part 1 of the DPA 2018	Not applicable to this project
Special Category Data	4	If you are relying on condition (b), (h), (i) and/or (j) you must outline which element of the project relies on this condition	Not applicable to this project
Special Category Data	5	If you are relying on condition (g) you must identify at least one of the additional conditions from Schedule 1 Part 2 of the DPA 2018	(8) Equality of opportunity or treatment
Special Category Data	6	If you are relying on condition (g) (substantial public interest) you must outline which element of the project relies on this condition	The information is used to create access solutions for a student either attending or joining soon. The Authority's duty under Schedule 10 of the Equality Act 2010 to proactively improve the access to the physical environment of school which KCC has capital responsibility for (community, foundation and voluntary controlled (VC) schools). It

			supports individual children to attend, or who are attending, these schools and require reasonable adjustments to be able to access the schools' facilities.
<b>Special Category Data</b>	7	If you are relying on condition (c), (d), (e), and/or (f) you must outline which element of the project relies on this condition	Not applicable to this project
<b>Basic Data</b>	1	The Article 6 lawful basis for this processing activity is:	(e) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Please note you will be required to state the name and section of the legislation which gives you the power.
<b>Basic Data</b>	2	Please outline which element of the project relies on the identified lawful basis	To support this work the Authority has drafted a Schools Access Initiative (SAI) Policy and Procedure. This discharges the Authority's duty under Schedule 10 of the Equality Act 2010 to proactively improve the access to the physical environment of school which KCC has capital responsibility for (community, foundation and voluntary controlled (VC) schools). It supports individual children to attend, or who are attending, these schools and require reasonable adjustments to be able to access the schools' facilities.