

# Data Protection Impact Assessment (DPIA) – Parental Involvement and Engagement Census (PIE).

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This template was developed by the SG Data Protection and Information Assets team.

This template was last updated in August 2021.

## 1. Introduction

The purpose of this document is to report and assess against any potential Privacy Impacts resulting from collecting data on parental involvement and engagement as part of the Parental Involvement and Engagement Census. The data is to be collected and owned by Scottish local authorities (and grant-aided schools) but shared with the Scottish Government (who will then become the data controller for this shared data).

## 2. Document metadata

- 2.1 Name of Project: Parental Involvement and Engagement (PIE) Census. From the 2021/22 school year, data to be collected by 32 local authorities (and grant-aided schools) for research and statistical analysis and shared with and held by Scottish Government for National reporting within the National Improvement Framework and National Action Plan for Parental Engagement.
- 2.2 Author of report: Mick Wilson, Gary Sutton, Jill Morton – Education Analytical Services Division, Scottish Government.
- 2.3 Date of report: August 2021
- 2.4 Name of Information Asset Owner (IAO) of relevant business unit: Mick Wilson
- 2.5 Date for review of DPIA:

Review date	Details of update	Completion date	Approval Date
24 November 2020			
24 August 2021	Updates to dates and UK GDPR text (to reflect changes in legislation post UK leaving the European Union)	24/08/2021	26/08/2021

### 3. Description of the project

#### 3.1 Description of the work:

This activity will make improvement to the data collection landscape around parental involvement and engagement data in Scotland. Relevant data collections have been set up by individual local authorities, grant-aided schools, Education Scotland and parental engagement organisations such as the National Parent Forum Scotland, but the disparity of sources and approaches to collecting the data means that there has been little potential for using the data systematically to enable national level evaluation of policy initiatives.

The [National Action Plan on Parental Engagement](#), as well as the [National Improvement Framework \(NIF\)](#) require evidence to ensure their aims are being delivered, there is also an increasing need for high quality improvement data at a local level. The PIE Census aims to rationalise the collection of Parental Involvement and Engagement data by providing a set of questions all local authorities and grant-aided schools will be invited to ask in their respective areas. This should result in comparative data being collected and will be used to drive improvement at a local level and to help monitor the progress of national policies.

All parents/carers who have children in publicly funded primary, secondary and special schools in Scotland are invited to take part in the census. Questions will focus on the experience with the child's / children's school overall, therefore only one questionnaire per school will be issued to parents/carers with more than one child.

Delivery of the census and exact arrangements around it will be the responsibility of individual local authorities and grant-aided schools, but it is envisaged that parents will be emailed (or texted) a link to the census questionnaire provided on the SmartSurvey online data collection platform. Parents will be able to respond either on their personal computers, laptops, smartphones or tablets. An option for paper completion may be provided by local authorities and grant-aided schools, where necessary. Any arrangements in addition to these will vary depending on local circumstances.

Once the data has been collected, LAs and grant-aided schools would share this information with the Scottish Government's Education Analytical Services Division, which is part of the Scottish Government's Learning Directorate, as, under the [Scottish Schools \(Parental Involvement\) Act 2006](#) Scottish Ministers have a duty "to promote the involvement of the parents of pupils in attendance at public schools in the education provided to those pupils by the schools" and therefore need data to monitor and evaluate this duty.

Also, the [Local Government \(Scotland\) Act 1973](#) states that "the appropriate Minister with respect to any matter may require [a local authority] to provide him with any information with respect to that matter which is in the possession of, or available to, that [local authority] in consequence of the exercise of any power conferred by or under any enactment".

The benefit to the public of this data being shared with Scottish Ministers is to help in the formulation and monitoring of national and local policies, which in turn will ultimately drive forwards improvements in the outcomes of Scotland's Children and Young People.

### 3.2 Personal data to be processed.

Variable	Data Source
Age of respondent (age group)	PIE
Respondent's gender	PIE
School name of respondent's child	PIE
Respondent's home postcode (needed in full in order to analyse results by deprivation (SIMD) areas). However, access to the full postcode will be restricted to staff within the Scottish Government's data processing team (Analytical Data Management Team) in order to assign an SIMD variable. Analysts will not see the postcode in full.	PIE
Respondent's Ethnic Background	PIE
Parents/Carer view of school & child's learning	PIE

### 3.3 Describe how this data will be processed:

The data collected and processed by the Scottish Government will contain certain socio-demographic information on parents/carers of children in Scottish schools but in the vast majority of cases this will not be sufficient to identify individual respondents.

The survey will be delivered via an online platform, which parents will be access using their personal computers, tablets or smartphones by clicking on a generic link provided to them by the local authority or school educating their child(ren). No unique identifiers will be used, and the Scottish Government will not receive any names or addresses of the respondents. Provision of any identifiable socio-demographic data will be optional and at the discretion of respondents. Postcode data will only be used to identify the SIMD area (e.g. quintile) a respondent's household is in, and once this information has been processed, the full postcode will be edited out of the main dataset.

What is SmartSurvey?

SmartSurvey is a UK-based provider of digital survey solutions. This has been purchased by the Scottish Government's Education Analytical Services division using the Cabinet Office's G-Cloud 10 Framework.

In relation to the gathering of data for the Census by each local authority and grant-aided school, the Scottish Government will act as the Data Processor (and SmartSurvey will act as the sub-processor). The Data Controller for the data gathered by each local authority and grant-aided school will be the local authority and grant-aided school themselves.

There is a call-off contract in place between the Scottish Government and SmartSurvey, and a Data Processor Contract is in place between the Scottish Government and Scottish Local Authorities / grant-aided schools.

Once each local authority and grant-aided school has conducted its own Census it will then share its data with the Scottish Government. Data Sharing Agreements will be in place between the Scottish Government and Local Authorities / grant-aided schools in order for this to occur. Once transferred, the Scottish Government will become a Data Controller of the data it then holds for its own statistical analysis and research purpose.

Local authorities will transfer their data to the Scottish Government's Education Analytical Services division using Objective Connect. Objective Connect is a UK hosted using Microsoft Azure platform and has a Government Grade security where information is always protected.

When data is transferred to Scottish Government, data will then be stored in a data warehouse application called dbXed based on SQL Server 2008. For analysis undertaken through SAS (Statistical Analysis Software), secure connections connect SAS to dbXed, the data warehouse.

Access to data rooms is strictly controlled, and access to the data sets is securely restricted to a limited small number of Scottish Government staff based in the Learning Analysis and IT / SAS support teams.

These servers are hosted in one of two data centres and can only be accessed from the internal Scottish Government network, known as SCOTS. The primary data centre is at Saughton House, a Scottish Government building in Edinburgh.

Access is controlled at two levels:

1. At the operating system level, using Windows Access Control Lists (ACLs) to grant access to the members of the approved Active Directory security groups.
2. Within SAS metadata, using SAS Access Control Templates (ACTs) to grant access to the members of groups defined in the metadata.

All Scottish Government staff are required to complete annual training on data protection and information security to ensure staff are aware of the responsibilities when handling data.

The Information Asset Owner (IAO) for this data is Mick Wilson, Deputy Director: Education Analytical Services, and Information & Technology Services (iTECS) fulfils the role of System Custodian.

As Systems Custodian, iTECS operates and manages the data storage system to ensure it is protected, held securely and can only be accessed by users who have been approved by the IAO or Systems Owners, in this case, the Scottish Government's Chief Statistician, Roger Halliday.

## **Data Sharing**

Individual level data may be shared for research purposes. If researchers request data for research, the application will be examined by the Scottish Government's Data Access Panel which will determine if the research question is of public benefit, if the researchers have been adequately trained for handling sensitive data, and that adequate security is in place for handling the data. Researchers will not publish any information that identifies individuals. The Scottish Government will transfer the data securely to the researchers.

The Data Access Panel meet to discuss requests that have been received which are looking to access personal data and there is high risk associated with the request.

Any sharing or linkage of data will be done under the strict control of Scottish Government, and will be consistent with our data policy and the [National Data Linkage Guiding Principles](#). Decisions on the sharing or linkage of data will be taken in consultation with relevant colleagues and individuals within and outwith Scottish Government as part of a Data Access Panel. At all times the rights of the individual (children or adults) under the UK GDPR and other relevant legislation will be ensured

We consider the six Guiding Principles before undertaking a data linkage project, and ensure that the sharing of personal data involves the following process

1. Draft a data sharing agreement
2. Ensure all participants agree to the rules of the agreement
3. Have the agreement signed by the relevant Scottish Government information asset owner(s) and a senior staff member of each participating organisation(s)
4. Log the agreement in the information asset register against the relevant information asset and then publish the agreement.

### 3.4 Explain the legal basis for the sharing with internal or external partners:

The data we collect from Local Authorities and grant-aided schools is used to monitor the operation of the relevant legislation in Scotland. This enables Scottish Ministers, other public bodies, relevant stakeholders and the general public to monitor the extent of parental engagement in Scotland, and provides evidence to help with the development or refinement of policies, programmes and services designed to improve outcomes for children and young people of Scotland.

Therefore, for the same reason the Scottish Government collects and analyses the data, the datasets may be shared in order to enable other organisations (public bodies, third sector organisations and academics) to undertake research which can provide evidence on parental engagement in the broader public interest. Any onward sharing will be on a case by case basis and with a clearly identified legal gateway and data sharing agreement in place.

UK GDPR Article 6(1)(e) provides a lawful basis for processing data where:

“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”.

UK GDPR Article 9(2)(j) provides a lawful basis for processing special category data where:

“processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) (as supplemented by section 19 of the 2018 Act) based on domestic law 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 the interests of the data subject”.

UK GDPR Article 89(1) provides a lawful basis for processing of data for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, and the data shall be subject to appropriate safeguards, in accordance with this Regulation, for the rights and freedoms of the data subject.

UK GDPR Article 89(1A) makes provision, in the 2018 Act, section 19, about when the requirements in paragraph 1 are satisfied. The Data Protection Act 2018, Section 19 makes provision about

- (a) processing of personal data that is necessary for archiving purposes in the public interest,
- (b) processing of personal data that is necessary for scientific or historical research purposes, and
- (c) processing of personal data that is necessary for statistical purposes.

In the view of the Scottish Government, there is a legitimate condition for processing as this data is needed to perform a task carried out in the public interest.

The data to be shared will not be processed to support measures or decisions with respect to particular individuals, it is being shared for the purpose of research and producing aggregate statistics. The data will not be processed in a way that substantial damage or distress is, or is likely to be, caused to any data subject and the results of any research or any resulting statistics are not made available in a form which identifies a data subject.

As a result of these safeguarding conditions being met, Principle 5 (retention of data) and Section 7 (data subject rights) of the Data Protection Act. The Scottish Government has the implied power to share this data which is necessary for the administration of the functions of government.

Scottish Government has responsibilities as a producer of Official Statistics as detailed in the [Statistics and Registration Services Act 2007](#), where [Section 10](#) establishes the [Code of Practice \(CoP\) for Official Statistics](#). This requires us to:

Meet user needs, as defined under principle 1 of the CoP, including: dissemination of official statistics to meet the requirements of informed decision making by government, public services, business, researchers and the public and to maximise public value.

Make statistics available to all users, as in principle 8 of the CoP, including: make statistics available in as much detail as is reliable and practicable, subject to legal and confidentiality constraints and ensure that official statistics are disseminated in forms that enable and encourage analysis and reuse.

By sharing our data with researchers (both internally and externally), we are meeting the requirements of informed decision making by government and researchers, maximising the public value of the statistics, and encouraging analysis and re-use.

All onward sharing will be on a case by case basis and with a clearly identified legal gateway and data sharing agreement in place. We will only share the data with researchers if their research question is of public value, and they can demonstrate that they will handle the data securely.

#### 4. Stakeholder analysis and consultation

4.1 List all the groups involved in the project, and state their interest.

Group	Interest
Scottish Local Authorities and Grant-Aided Schools	Responsible for delivering the census. They are the primary data controllers of the census data and will be using it internally to drive improvement of parental involvement and engagement in their schools.
Scottish Government	Will initially be Data Processors as Local Authorities gather their data. However, once local authorities have gathered their own data, they will then share it with the Scottish Government. At this time, the Scottish Government will become a data controller of this share data and will use it to produce a national and local level analysis using this. PIE data will be used to inform progress against national strategies and provide evidence driving policy change.
SmartSurvey Ltd	Will be the sub-processor as local authorities gather their data.
Education Scotland	Will be users of the census results compiled by the Scottish Government to monitor progress against national and local strategies.
School pupils and their parents	Will be users of the census results compiled by the Scottish Government, and indirectly

	influenced by policies devised as a result of PIE collection.
School boards and parent forums	Will be users of the census results compiled by the Scottish Government, and indirectly influenced by policies devised as a result of PIE collection.
Parental involvement / engagement organisations	Will be users of the census results compiled by the Scottish Government to monitor progress against national and local strategies

#### 4.2 Method used to consult with these groups when making the DPIA.

We regularly meet with all the above groups to discuss data requirements, and issues surrounding the gathering, quality and reliability of such data. We also consult with stakeholders and users of Scottish Government statistics to inform them of what we publish and to seek their views on whether this meets their needs.

#### 4.3 Method used to communicate the outcomes of the DPIA .

Publication of the final Data Privacy Impact Assessment on Scottish Government website.

### 5. Questions to identify privacy issues

#### 5.1 Involvement of multiple organisations

Local Authorities and grant-aided schools are the owners and controllers of the census data and will be responsible for implementing this work. They will all have processes in place for the handling of personal data.

#### 5.2 Anonymity and pseudonymity

Census questionnaires will be delivered using a generic web link and not linked to any unique identifiers.

While there is a very small potential for individuals becoming identified through the raw data in extreme cases (small rural schools with limited numbers of pupils)

However, as required when processing data for archiving, statistical and research purposes, the identification of individuals will be mitigated against by suppressing any aggregated results based on small numbers, so that individuals will not be identified from any published results.

#### 5.3 Technology

The personal data gathered is information that will have been gathered by local authorities and grant-aided schools for their own legislative functions, using SmartSurvey. The Scottish Government's own IT system (SCOTS) has been accredited with cyber essentials plus and is part of the IT system that will ensure this data is kept secure once shared with the Scottish Government.

#### 5.4 Identification methods

N/A

#### 5.5 Sensitive/Special Category personal data

Ethnicity

## 5.6 Changes to data handling procedures

No changes need to be introduced.

## 5.7 Statutory exemptions/protection

Article 21 of the UK GDPR gives individuals the right to object to the processing of their personal data. However, where the processing personal data is for scientific or historical research, or statistical purposes, your right to object is more restricted.

Article 21 (6) states:

“Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her personal situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.”

As the data we process is lawfully gathered and necessary for the performance of a task carried out for reasons of public interest, you do not have a right to object to the processing of your personal data because it is necessary for the performance of a task carried out in the public interest.

Also, as we require this data for the performance of a task carried out in the public interest (and for no other purpose, such as direct marketing), Article 17(3) of the UK GDPR states that we are also not required to erase any personal data as we need to retain this data for this purpose.

The Data Protection Act received Royal Assent on 23 May 2018. Part 6 of this Act “Derogations etc. based on Article 89 for Research, Statistics and Archiving” states that certain UK GDPR provisions do not apply to personal data processed for—

- (a) scientific or historical research purposes, or
- (b) statistical purposes,

to the extent that the application of those provisions would prevent or seriously impair the achievement of the purposes in question. However, these exemptions are only available where:

- (a) the personal data is processed in accordance with Article 89(1) of the UK GDPR (as supplemented by section 19), and
- (b) as regards the disapplication of Article 15(1) to (3), the results of the research or any resulting statistics are not made available in a form which identifies a data subject.

Part 6 of this Act “Derogations etc. based on Article 89 for Research, Statistics and Archiving” also states that certain UK GDPR provisions do not apply to personal data processed for—

- (a) archiving purposes in the public interest

to the extent that the application of those provisions would prevent or seriously impair the achievement of those purposes. However, these exemptions are only available where:

- (a) the personal data is processed in accordance with Article 89(1) of the UK GDPR (as supplemented by section 19).

As the data we process is lawfully gathered and processed for Research, Statistics and Archiving in the public interest, in accordance with Article 89(1) of the UK GDPR, and that any results of the

research or resulting statistics are not made available in a form which identifies individual children, young people or adults, you do not have a right to request access to the data we hold.

Regarding the retention of data, Article 5 of the UK GDPR "Principles relating to processing of personal data" states:

"personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject

The data are processed in line with this legislation. The information collected will be used to inform planning and provision of education, and where necessary, with the potential linkage of such data to other data sources (e.g. educational outcomes). For example, researchers or charities may be interested in applying for access to education data to meet their own research needs.

### 5.8 Justification

Factors that may impact on the acceptability of risks to privacy involved in the project are low risk. The data is used for statistical and research purposes only. No action will be taken on any specific individual as a result of the information collected and held by LAs, grant-aided schools and the Scottish Government, and results will be published in a way that doesn't identify individuals.

### 5.9 Other risks

When the Census data is being gathered, local authorities and grant-aided schools will be the data controller, the Scottish Government will be the Data Processor, and SmartSurvey Ltd. will be the sub-processor. A Data Processor Contract is in place, together with a contract between the processor and sub-processor.

Once local authorities and grant-aided schools shares its own data with the Scottish Government, then the Scottish Government will become the Data Controller for this shared data. A Data Sharing Agreement will be signed by both parties for this arrangement.

## 6. General Data Protection Regulation (UK GDPR) Principles

Principle	Compliant – Yes/No	Description of how you have complied
6.1 Principle 1 – fair and lawful, and meeting the conditions for processing		<p>Article 6(1)(e) of the UK GDPR gives us a lawful basis for processing where:</p> <p>“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”</p> <p>Article 9(2) of the UK GDPR states the conditions for processing special category data, one of which is:</p> <p>(j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) (as supplemented by section 19 of the 2018 Act) based on domestic law 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 the interests of the data subject.</p> <p>These are fulfilled for this data collection as the data will be used to enable us to improve the parental involvement and engagement of parents/carers with their child’s learning and reduce inequalities by monitoring and analysing these by various characteristics. We intend to use this information to help identify specific groups (at an aggregated level) for targeted support which in turn should improve the outcomes for children and young people.</p>
<b>Principle</b>	<b>Compliant – Yes</b>	<b>Description of how you have complied</b>
6.2 Principle 2 – purpose limitation		Data will be used by schools, local authorities, and the Scottish Government for the purposes outlined above. Privacy notices will be issued by both Scottish Government and schools, and local authorities acting as data controllers making it clear what the data will be used for and what rights exist regarding the data that is collected from parents/carers. The data will only be used for statistical and research purposes.
<b>Principle</b>	<b>Compliant – Yes</b>	<b>Description of how you have complied</b>
6.3 Principle 3 – adequacy, relevance and data minimisation		<p>The data to be collected in this data collection have been carefully considered and kept to the minimum necessary to help improve the parental engagement of parents/carers with their child’s learning and reduce inequalities.</p> <p>Respondents provide their school name to help local authorities to undertake analysis by school. Postcode data will also be collected to assess how deprived the area parents/carers lives is in.</p>
<b>Principle</b>	<b>Compliant – Yes</b>	<b>Description of how you have complied</b>

6.4 Principle 4 – accurate, kept up to date, deletion		The data will be quality assured to ensure the accuracy of the data, and will be regularly reviewed and, when it is no longer required, it will be destroyed securely in line with the Scottish Government information handling protocols.
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Principle	Compliant – Yes	Description of how you have complied
6.5 Principle 5 – kept for no longer than necessary, anonymization		<p>Article 5 of the UK GDPR “Principles relating to processing of personal data” states:</p> <p>“personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by UK GDPR in order to safeguard the rights and freedoms of the data subject”.</p> <p>The data are processed in line with this legislation. The Scottish Government will regularly review the need for the data to determine if the information is still required and, if it is not required, it will be destroyed securely in line with the Scottish Government information handling protocols.</p>

Principle	Compliant – Yes	Description of how you have complied
6.6 UK GDPR Articles 12-22 – data subject rights		A privacy notice will be published by local authorities, schools and grant-aided for their own data collections, and who their data will be shared with (such as with the Scottish Government). The Scottish Government will also publish its own privacy notice to inform individuals of why their data has been shared with us. Parents and children and young people themselves have the right to contact data controllers such as the school, local authority, or the Scottish Government to find out who processes their data, for how long it may be retained and the reasons for why it is retained.

Principle	Compliant – Yes	Description of how you have complied
6.7 Principle 6 – security		Data will be held on secure systems managed and held by local authorities and other public bodies, and by the Analytical Data Management team on secure servers with access only granted to staff deemed to have the training and legitimate need to access such data. Data will be securely transferred from data providers to the Scottish Government.

Principle	Compliant – Yes	Description of how you have complied
6.8 UK GDPR Article 24 - Personal data shall not be transferred to a country or territory outside the United Kingdom.		The data collected in this project will be held within Scotland and not subject to being shared outside the United Kingdom.

## 7. Risks identified and appropriate solutions or mitigation actions proposed

Is the risk eliminated, reduced or accepted?

Risk	Ref	Solution or mitigation	Result
There is a risk of data disclosure when data is shared with others for statistical/research purposes	1	Any request to share data will be considered either by the relevant EAS Statistician and the Divisional Data Access Officer (simple requests) or by a Data Access Panel (complex requests). Access is only agreed where it is clear that EAS Division has the legal right to share data, where the use of the information is considered consistent with the original purposes for collecting the data, where no individuals will be publicly identified as a result of the analysis and where appropriate safeguards and checks are in place to ensure the security of the data throughout its exchange and use.	The process to approve requests for data sharing and checks in place to ensure data security on transfer will <b>reduce</b> the risk.
Risk that there may be a data breach when data is transferred from data providers to the Scottish Government resulting in the release of personal data	2	Mitigating against the risk of a breach by using a secure system for the transfer of data from partners to the Scottish Government, and from Scottish Government to partners. Staff will be provided with relevant data protection training to properly handle data and reduce the risk of a data breach.	Use of the secure system will <b>reduce</b> the risk of data breach on transfer
Risk that data providers may not update their privacy notices and other materials to accurately reflect what data is being shared with the Scottish Government.	3	The Scottish Government will communicate clearly with data providers and to promote a clear shared understanding of what is required of data controllers to ensure that they are fully UK GDPR compliant.	Communicating changes with local authorities and settings to <b>reduce</b> the risk of individuals not being aware of how their information will be processed.

## 8. Incorporating Privacy Risks into planning

Explain how the risks and solutions or mitigation actions will be incorporated into the project/business plan, and how they will be monitored. There must be a named official responsible for addressing and monitoring each risk.

Risk	Ref	How risk will be incorporated into planning	Owner
There is a risk of data disclosure when data is shared with others for statistical/research purposes	1	Mitigating actions at section 6 are incorporated into routine business and project plans.	Jill Morton
Risk that there may be a data breach when data is transferred from data providers to the Scottish Government resulting in the release of personal data	2	Transferring data securely is an established part of routine business and security will be considered at all stages of data processing. Secure data processing is integral to the core business of the Analytical Data Management Team and Education Analytical Services and also on data provider Management Information Systems where they are involved in the data processing.	Gary Sutton
Risk that data providers may not update their privacy notice and other materials to accurately reflect what data is being shared with the Scottish Government.	3	Communicating with data providers on what is required of them will happen on a regular basis. However each data provider is responsible for making individuals aware of what happens to the data they provide to meet data protection legislation.	Jill Morton

## 9. Data Protection Officer (DPO)

The DPO may give additional advice, please indicate how this has been actioned.

Advice from DPO	Action

## 10. Authorisation and publication

The DPIA report should be signed by your Information Asset Owner (IAO). The IAO will be the Deputy Director or Head of Division.

Before signing the DPIA report, an IAO should ensure that she/he is satisfied that the impact assessment is robust, has addressed all the relevant issues and that appropriate actions have been taken.

By signing the DPIA report, the IAO is confirming that the impact of applying the policy has been sufficiently assessed against the individuals' right to privacy.

The results of the impact assessment must be published in the eRDM with the phrase "DPIA report" and the name of the project or initiative in the title.

Details of any relevant information asset must be added to the Information Asset Register, with a note that a DPIA has been conducted.

**I confirm that the impact of Parental Involvement and Engagement Survey has been sufficiently assessed against the needs of the privacy duty:**

Name and job title of a IAO or equivalent	Date each version authorised
Mick Wilson	26 <sup>th</sup> August 2021

