DATA PROTECTION IMPACT ASSESSMENT PROCEDURE

1. Scope

All projects that involve processing personal data, or any activities (both internal and external) that affect the processing of personal data and impact the privacy of data subjects are within the scope of this procedure and will be subject to a data protection impact assessment (DPIA).

2. Responsibilities

2.1 The Data Protection Officer / GDPR Owner and resource owner is responsible for performing necessary checks on personal data to establish the need for conducting a DPIA.

2.2 The resource owner and Data Protection Officer / GDPR Owner are responsible for checking appropriate controls are implemented to mitigate any risks identified as part of the DPIA process and subsequent decision to proceed with the processing.

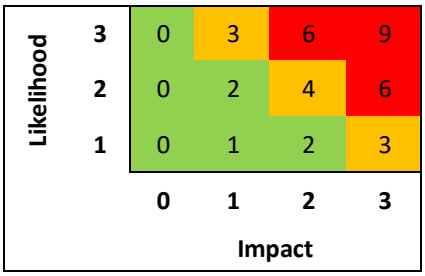
2.3 Resource Owners are responsible for implementing any privacy risk solutions identified.

3. Procedure

3.1 The Data Protection Officer / GDPR Owner / project manager / resource owner identifies the need for a DPIA at the start of each project, assessing the project and type of personal data involved, or processing activity, against the screening questions set out in the DPIA tool (GDPR REC 4.4).

3.2 Using the criteria below, following the likelihood and impact matrix, Luminate Education Group defines the risks to rights and freedoms of data subjects as (GDPR REC 4.4):

Likelihood and impact matrix (see next page):



Risks to rights and freedoms of data subjects:

Risk Level	From	To	GDPR Assessment
High	6	9	Highest unacceptable risk
Medium	3	5	Unacceptable risk
Low	1	2	Acceptable risk
Zero	0	0	No risk

4. Data processing workbook (data flow)

4.1 Luminate Education Group records key information about all personal data processed for each project in the DPIA Tool workbook (GDPR REC 4.4). This includes a description of the processing and purposes; legitimate interests pursued by the controller; an assessment of the necessity and proportionality of the processing; an assessment of the risks to the rights and freedoms of data subjects (as per the matrix and risk level definitions in clause 3.2 above).

4.2 Luminate Education Group captures the type of processing activity associated with the personal data being processed as part of the project in the DPIA Tool workbook (GDPR REC 4.4). These are categorised as:

- Collection
- Transmission
- Storage
- Access
- Deletion

4.3 Luminate Education Group establishes on what lawful basis the data is being processed and its appropriate retention period (in line with Retention of Records Procedure GDPR DOC 2.3).

4.4 Luminate Education Group identifies the category of data processed, whether it is personal, special or that of a child's, and the format of the data.

4.5 Luminate Education Group identifies who has access to the data (individuals, teams, third-parties or data processor) or who are involved in the processing of personal data, or processing activity, recording the geographic location of where the processing takes place and / or if it is transborder processing.

5. Identify privacy risks

5.1 Luminate Education Group assesses the privacy risks for each process activity as described in clause 3 above by:

5.1.1 Identifying and describing the privacy risk associated to that process activity
5.1.2 Using the likelihood criteria (1 – low, 2 – medium and 3 - high), scoring the likelihood of the risk occurring
5.1.3 Using the impact criteria (0 – zero impact, 1 – low, 2 – medium and 3 - high) of the risk should it occur
5.1.4 Producing a calculated risk, identifying the risk to the rights and freedoms of data subjects.

5.2 In assessing the privacy risks, Luminate Education Group considers: risks to the rights and freedoms of natural persons resulting from the processing of personal data; risks to the business (including reputational damage); and its objectives and obligations (both regulatory and contractual).

5.3 Luminate Education Group identifies solutions to privacy risks, assigns a risk owner and sets a target date for completion.

5.4 Luminate Education Group prioritises analysed risks for risk treatment based on the risk level criteria established in clause 3.2 above.

5.5 Luminate Education Group risk owner, in consultation with Data Protection Officer, approves and signs off each DPIA for each data processing activity.

6. Prior consultation (Article 36, GDPR)

6.1 Where the DPIA identifies that processing of personal data will result in high risk to the data subject, in the absence of risk mitigating measures and controls, Luminate Education Group consults with the supervisory authority using the following method.

6.2 When Luminate Education Group requests consultation from the supervisory authority it provides the following information:

6.2.1 detail of the responsibilities of Luminate Education Group *([controller/processor/joint controller]*), and the *[data controller/processor/joint controller]* involved in the processing;
6.2.2 purpose of the intended processing;
6.2.3 detail of any/all measures and controls in place/provided to protect the rights and freedoms of the data subject(s);
6.2.4 contact details of the Data Protection Officer / GDPR Owner as recorded
6.2.5 a copy of the data protection impact assessment; and
6.2.6 any other information requested by the supervisory authority.

Document Owner and Approver

The Luminate Director of IT is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of the Luminate Education Group.

This procedure is issued on a version controlled basis.

Change History Record

Issue	Description of Change	Date of Policy
1.0	Initial issue	10/11/2017
1.1	Annual Review	08/11/2018
1.2	Annual Review – Responsibilities updated	23/11/2019
1.3	Annual Review – Luminate Education Group	28/10/2020
1.4	Annual Review – Privacy Notices updated	06/11/2021
1.5	Annual Review and update	16/11/2022
1.6	Reviewed - Removed LCC Instance	19/09/2023
1.7	Review – No update	29/10/2024
1.8	Annual Review – No amendments required	25/06/2026