Blackboys C.E. School
School Lane
Blackboys
Uckfield
East Sussex
TN22 5LL
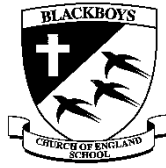
Framfield C.E. School
The Street
Framfield
Uckfield
East Sussex
TN22 5NR

Data Protection Impact Assessment
Arbor

In our Church of England Federation, we take strength in collaboration, yet celebrate uniqueness. As schools, we may be small, but together we develop children ready to make their mark on the world. We welcome the child yet embrace the whole family. We celebrate our rural environment yet aspire to look beyond our boundaries. We strive for knowledge and gratefully accept opportunities that come our way. We all take a pride in our Federation as we follow in Jesus's example.

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Data Protection Impact Assessment (DPIA)

<u>Top Tips:</u>
- If you're unsure whether you need to complete a DPIA, check the DPIA Screening flowchart (in Appendix 1 of the DPIA Guidance document available through our online resources here).
- Don't forget you can contact the ESCC Information Governance team for advice and support when completing this document or send it across for review once completed.
- For additional guidance while completing this form, see the DPIA guidance document available here.

New project / processing activity	Arbor MIS
Project / Activity lead	Graham Sullivan
Document Creation Date	28/1/25

SECTION 1 – Why is a DPIA required?

You should briefly explain why you want to process personal data in a new way and any new systems or software that will be involved.

Why has the proposed new processing come about? What is the background?
St Thomas a Becket Federation is migrating to a new MIS system, Arbor. This will be cloud based MIS with staff access via a web interface, and parent access from an app. As such, the School is undertaking a Data Protection Impact Assessment (DPIA) to consider the privacy implications and assess any potential data protection compliance risks with using Arbor MIS.

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SECTION 2 – What is the proposed new processing?

> **What is the specific purpose(s) of the new processing?**
>
> St Thomas a Becket Federation intends to use Arbor to help deliver a cost effective solution to meet the needs of the business. Arbor, a cloud based MIS, will improve accessibility and ensure information security when working remotely.
>
> The School will undertake the following processes with Arbor:
> - Collecting personal data
> - Recording and organising personal data
> - Structuring and storing personal data
> - Copying personal data
> - Retrieving personal data
> - Sharing personal data
> - Deleting personal data
>
> By opting for a cloud-based solution the school aims to achieve the following:
> - Scalability
> - Reliability
> - Resilience
> - Delivery at a potentially lower cost
> - Supports mobile access to data securely
> - Update of documents in real time
> - Good working practice, i.e. secure access to sensitive files
> - More streamlined, faster system that will make the admin team and staff more efficient.
> - A single place for a number of systems to be combined:
>   - SIMS pupil, staff, assessment data etc
>   - Online payment system for parents and parent evenings booking system being moved from existing ParentMail system
> - Providing a central point of data control for parents – access to all relevant data about their child with simple processes for them to ensure this is kept up to date
> - More efficient communication with parents, including the ability to securely send them documents such as reports.
>
> Arbor will enable the school to manage student information in a variety of ways through three broad modules:
> - Module (1) MIS Core, which include attendance, behaviour, progress tracking and school census.
> - Module (2) MIS Comms, which include Parental Portal, Parents Evening Booking, Arbor App and Student Report Cards.
> - Module (3) MIS Perform, which include Curriculum Tracking, Payments, Meal Management and Intervention Tracking. Functionality includes the following:

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- Communications: Send and receive e-mail and SMS messages
- Intuitive Dashboards: which give an overview of key performance measures, management of schools exams end to end
- My Classroom: creating seating plans and managing the classroom setting
- Report Builder: building reports using data from Arbor
- Payments: Management of online and offline payments for meals, clubs and trips. Easily schedule activities and link them to payments and consent
- Safeguarding: securely permissioned access to special category safeguarding data including SEN. Record and report on attendance and student behaviour. Add interventions and monitor for effectiveness
- Staff and HR: keeping track of staff absences, appraisals and objectives

In addition, Arbor has the ability to integrate with a number of third-party systems including ParentPay and My Concern.

The cloud service provider is a Data Processor and cannot do anything with the school's data, unless they have been instructed by the school.

What categories of personal data will be processed?	
Name	Yes
Address	Yes
Date of birth	Yes
Gender	Yes
Marital status	Yes
Telephone number	Yes
Email address	Yes
IP address	Yes
Location based data	No
Financial information	Yes

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Images of pupils	Yes	
Video of pupils	No	
Other unique identifier	Yes	UPN
Will the new processing require any special category (sensitive) data?		
Racial or ethnic origin	Yes	
Political opinions	No	
Religious or philosophical beliefs	Yes	
Trade union membership	No	
Mental health	Yes	
Physical health (including SEN data)	Yes	
Sexuality	No	
Criminal offences	No	
Biometric data (e.g. fingerprints)	No	

How much personal data will be processed? How frequently?	
How many individuals' data will be included in this new processing?	NOR plus staff
How often will data be collected?	Daily
How often will data be used?	Daily

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Input:
- [Arbor migration team help to import the current SIMS database – this will require allowing this team to access the database remotely & / or in College. The SIMS database is uploaded to Arbor via a secure upload facilty (encrypted at both ends). The data is imported to our version of Arbor and then we are given access in order to check data integrity and accuracy. This is repeated three times.]
- Information collected by the School is retained on the school's computer systems and in paper files.
- The information is retained in line with the School's retention schedule and records management policy.
- Personal data is collected for all students. Additionally, personal data is also held respecting the school's workforce, Board of Governors, Volunteers, and Contractors. Data relating to sports coaches and other educational specialist is contained within the Single Central Record to ensure health and safety and safeguarding within the school e.g.
  - Student information is collected via registration forms when students join the school, student update forms the school issue at the start of the year, Common Transfer File (CTF) or secure file transfer from previous schools. Student information also includes classroom work, assessments and reports.
  - Workforce information is collected through application forms, CVs or resumes; information obtained from identity documents, forms completed at the start of employment, correspondence, interviews, meetings and assessments.

Storage:
- Data is stored in online cloud storage at a London based AWS datacentre (certified to ISO 27001)

Output:
- School routinely shares student information with relevant staff within the school, schools that the student attends after leaving, the Local Authority, the Department for Education, Health Services, Schools ICT (to provide Arbor support to the school), Arbor and various third party Information Society Services applications.
- School routinely shares workforce information internally with people responsible for HR and recruitment (including payroll), senior staff, with the Local Authority, and the Department for Education.
- [Data is shared automatically via third party extraction software (Wonde)

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- Data may be extracted by both manually and via automated routines by admin staff according to a strict access rights (based on school data protection and code of conduct policies for this) in the form of CSV exports.
- Data is used in order to facilitate integrated emails and text notifications to parents & students, including the sharing of pupil data for the following: reports (attitude to learning / assessments), behaviour, achievements, praise, attendance, pre-admissions, trips, general messaging.
- Data is accessed / processed / updated / amended / deleted as required via an online portal

Will personal data be shared with any other individuals or organisations? If so, why?

Who will data be shared with? *This could be an organisation or individual*	Status Data Controller (DC) or Data Processor (DP)?	Reason for sharing data
DFE	DC	Statutory returns, census
ESCC	DC	Personel Records, payroll, Statutory pupil returns, attendance data
My Concern	DP	Child protection
Numbots and TT Rockstars	DP	Education resources
Parent Pay	DP	Parents paying for school meals.
Chartwells	DP	School catering provider – information on allergies and FSM

What is the context for this processing?

How are the data subjects (the individuals whose data will be processed) connected to the school?	All staff, governors, volunteers, parents, pupils and contacts of pupils.

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	School collects and processes personal data relating to its students and employees to manage the parent/student and employment relationship. Through the Privacy Notice (student/workforce) St Thomas a Becket Federation is committed to being transparent about how it collects and uses data and to meeting its data protection obligation.
How much control will data subjects have over the use of their information?	The majority of information stored is required by the Government / DFE / Personel etc so they would not be able to object. Individuals will have some control over aspects of their information – parents will be able to update / remove information directly (with approval from admin team) for things such as contact information, addresses etc.
Would data subjects expect their information to be used in this way?	Yes – This is covered at a higher level within the school privacy notices as they state that personal data will be shared with "suppliers and service providers", e.g. Arbor in this instance. Parents will be updated about the new MIS being used because it will change how they communicate with the school. As part of this update we will also inform them of the data move and re-issue our privacy notice.
Will data be processed about children or vulnerable groups?	Yes
Have there been any prior concerns (public and/or internally within school) over this type of processing?	No
Is the processing in any way novel? E.g. use of new/untested technology, an innovative new initiative not tried elsewhere.	Yes – Although much of this data was previously processed by the school for these purposes, the system through which it is processed and the links between different systems are new. **The system however is well established and used in hundreds of other schools, so this should not present any additional risk.**
Will data subjects be aware of this new processing?	Yes - As above, will be informed of changes directly.

SECTION 3 – Who has been consulted about this processing?

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If you have sought the views of any parties involved in this processing this should be recorded below.

Stakeholder	When and how views sought	Concerns raised or advice given
Local Authority IT	Arbor is one of a number of MIS systems which are recommended and supported by ESCC Schools ICT.	Arbor is one of the MIS systems that has been actively promoted to schools by ESCC Schools ICT. They are an accredited support provider for Arbor
Headteacher, Bursar and Admin team	Involved in procurement process from the beginning.	Viewed demos of each MIS system and shared requirements before selection.
ESCC IG Team	Email	Review of DPIA

SECTION 4 – Is the processing necessary and proportionate?

Why is it **necessary** to process personal data? Why can the objectives not be achieved without processing personal data or by only using anonymous data?	MIS is fundamental to the running of the school, central store of all information on all pupils and staff. The school could not fulfil statutory obligations or provide effective education without processing personal data about students, staff and the wider school community through the MIS. Arbor will replace existing system

Principle 1: Article 5 (1) a. Lawfulness, fairness and transparency

Under the GDPR, personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

- For **all** new data processing you <u>must</u> complete table 1.
- Where processing includes special category data (as identified in Section 2 above) the GDPR requires an additional lawful basis, so you will also need to complete Table 2 to identify the most appropriate additional condition for the processing.

For more information on identifying the most appropriate lawful basis, please see the relevant page of our online resources here.

Table 1: What is your lawful basis for processing **personal data**?

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Consent has been (will be) obtained	No
A **contract** with the data subject is (will be) in place covering the processing of specified personal data	Yes (in the case of staff)
The school has a **legal obligation** or statutory authority to process the data	Yes
Data will be shared/processed in the **vital interests** of the data subject (or another individual) where there is threat to life	Yes (eg, share allergies/medical info in an emergency)
Processing is necessary for a task carried out in the **public interest** or in the exercise of official authority vested in the school	Yes o **Childcare Act 2006 (Section 40 (2)(a)** o **The Education Reform Act 1988** o **Further and Higher Education Act 1992,** o **Education Act 1994; 1998; 2002; 2005; 2011** o **Health and Safety at Work Act** o **Safeguarding Vulnerable Groups Act** o **Working together to Safeguard Children Guidelines (DfE)**
Necessary for the purposes of **legitimate interests** pursued by the school, except where such interests are overridden by the interests, rights or freedoms of the data subject.	No

Table 2: What is the <u>additional</u> condition for processing **special category** personal data?	
Explicit consent has been (will be) obtained and maintained.	No
Processing is necessary to carry out obligations in the field of employment and social security	Yes (in the case of staff)
Data will be shared/processed in the vital interests of the data subject where there	Yes (eg, share allergies/medical info in an emergency)

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is threat to life and the data subject is physically or legally incapable of giving consent	
The data subject has already manifestly made the information public	No
Processing is necessary for defence of a legal claim	No
Processing is necessary for reasons of substantial public interest	Yes – Wide range of legislation applies to the processing of this personal data for these purposes. Specific legislation is referred to within the school's Special Category Data policy.
Processing is necessary for delivery of health or social care services	No
Processing is necessary for protecting against serious public health implications	Yes in some cases
Storage is necessary for archiving purposes	Yes

Is the processing fair and transparent?		
Would data subjects reasonably expect their information to be used in this way?		Yes
Is any individual likely to be damaged by processing the information?		No
Will the proposed use of personal data infringe the right to privacy under Article 8 of the Human Rights Act?		No
Is processing (including sharing) transparent? How will individuals be notified about the use of their personal data?	Yes	Already covered by our privacy notice – all data being processed is already used in existing SIMS.net product. Also see Arbor's privacy notice: Arbor Privacy Policy – Arbor Help Centre (arbor-education.com)

Principle 2: Article 5 (1) b. Purpose limitation

According to the GDPR, personal data must only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

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Are all the purposes for processing personal data covered within this DPIA?	Yes
Has any personal data been obtained for one purpose and then will be used for a new different purpose in this project?	No

Principle 3: Article 5 (1) c. Data minimisation

According to the GDPR, you must process the appropriate quantity of personal data. This must be the minimum required whilst still ensuring that there is sufficient data to fulfil the required purpose.

Is the data being processed limited to the minimum required to fulfil the purpose?	Yes
Is the data being processed of adequate quality to fulfil the purpose?	Yes
Is more data than required being shared with any person or organisation outside the school?	No

Principle 4: Article 5 (1) d. Accuracy

Under the GDPR, personal data should be accurate and kept up to date. Every reasonable step must be taken to ensure that personal data that is identified as inaccurate is erased or rectified without delay.

How is the accuracy of data ensured?	Full checks of all the data by the admin team prior to the migration. Totals of key groups, e.g FSM, PP etc will be checked before and after migration. A random sample of student and staff records will also be checked.
Do systems (where relevant) allow data to be amended when required?	Yes

Principle 5: Article 5 (1) e. Storage limitation

According to the GDPR, personal data must not kept in a form which permits identification of the data subjects for any longer than is necessary and is only retained for as long as required for the original purpose.

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How long will the personal data be held for?	As per existing retention schedule. (no change to the amount or type of data being held)
How will information be deleted (or anonymised) when retention periods are reached?	Confirmed that the system allows for the deletion of pupils records at required times in line with GDPR, including if a pupil leaves or requests for deletion are made (provided they are valid) Arbor also allows retention periods to be set for data with it being automatically deleted at the end of that time.
Do software/systems allow deletion of information in line with retention periods?	Yes

Principle 6: Article 5 (1) f. Integrity & confidentiality

The GDPR states that personal data shall be processed securely including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

What controls are in place to manage and maintain secure access to data?	Access to the system is restricted. Staff can only access data required for their role. Secure passwords and 2-factor-authentication will be enabled for access outside of the schools system. Arbor maintains ISO27001:2013 certification. Certificate number LRQA10015370 256-bit ssl encryption used for data transfer. London based AWS datacentre.
How can you evidence that anyone who will have access to the personal data complies with the appropriate IG standards?	All staff who have access to the data will have undertaken GDPR training. School has an extensive Information Governance Framework in place (DP policy, DiT policy etc) covering the processing of personal data. Staff are bound by confidentiality as per our Staff Behaviour policy and Code of Conduct.
Where a third party is involved in hosting and/or processing data, what measures are in place to ensure Data Protection compliance?	See above. Further details of GDPR compliance are available from Arbor's Data Protection Policy to comply with GDPR – Arbor Help Centre (arbor-education.com)

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Has an ICT security Risk Assessment been completed (where applicable) and acted upon?	Arbor MIS is an approved supplier by Everything ICT (the DfE approved ICT procurement framework). Schools may wish to seek further assurance about IT Security Risk Assessment from their IT providers.

International Transfers

Under the GDPR, personal data shall not be transferred to a country or territory outside the UK unless that country of territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

For more information about this, as well as a list of common data processors used by schools and whether they store any data outside the UK, see the relevant page of our online resources here. Many data processors also make this information available directly on their websites or through their privacy notices. If you are unsure, check with your DPO.

Will the activity require processing, transfer, storage and/or access to personal data outside of the UK?	No

Data Subject Rights

See the DPIA Guidance document and the relevant page of our online resources for more information on types of data subject requests and legal requirements regarding responses to these requests.

How will the new processing/system allow you to respond to requests from data subjects in relation to the following rights?	Response
Right of Access (Subject Access Requests)	There are systems in place to produce SARs within the system. All pupil information is accessible on their central dashboard and can be downloaded easily by staff with appropriate access. Staff details can be automatically removed if required.
Right to Erasure	Systems are in place to remove individual records at the end of a retention period or by request. Given that some data may be held on the basis of legal obligation or public task it might not be possible to comply with all requests for erasure. DPO support would be sought if required.
Right to Object	It is unlikely that an objection request would be upheld, however, data subjects can still lodge an objection where the

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	legal basis is public task. The school would then have to demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.
Right to Rectification	Parents will be able to do this directly, with approval of the changes by a member of staff.
Right to Restriction	Functionality available but request may not be complied with, case depending.

Will any automated decision-making or profiling be carried out?	No

SECTION 5 - Assessment of Risk

You should complete this table to summarise and record any risks you have identified throughout the process of completing this DPIA. For each risk you should also record the steps you have or will take to mitigate it.

There is an example included below (in *red*) to demonstrate how this should be completed. Please ensure that this example is adapated or removed as appropriate when using this template. For further information on how to complete this section, as well as a wide range of potential risks and mitigations, see our DPIA guidance available here.

Risk	Overall risk *What is the likelihood and potential severity of harm posed?*	Mitigation(s)	Residual risk| *After mitigations*
Unauthroised Access to the system	Medium / High	2 factor authentication setup for access from outside the school - Strong passwords enforced for all staff - Arbor servers are patched continuously to reduce security vulnerabilities	Low
Staff access to more data than required	Medium risk	- Access to the system is restricted. Staff can only access data required for their role. - Staff acceptable use and data	Low

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		protection policies • Staff have data protection training • Staff have training in using Arbor	
Inappropriate use of data	Medium risk	• Access to the system is restricted. Staff can only access data required for their role. • Staff acceptable use and data protection policies • Staff have data protection training • Staff have training in using Arbor	Low
Out of date information	**Medium**	• Parents given access to their childs/their information to check for accuracy and submit changes as required	Low
Accidental deletion of information	**Medium**	• Staff only have access to information they require • System is backed up daily to allow restores for up to 30 days	Low
Links to other systems	**Medium**	• All partners are vetted by Arbor before having access to the API • Regular reviews of systems which have automatic access to data	Low
Risk of parents accessing TPD data (e.g. separated parents or other contacts for the child)	**Medium**	• The system is designed so that one parents cannot see another parents contact information. • If a parent does not live at the pupils home address, they are not able to see the pupils home address.	Low
Risk of compromise or inappropriate access during transfer of data between the school and the cloud	**Low/Medium**	• All data is encrypted at rest and in transit using 256 bit SSL encryption. • All Arbor servers are situated in secure locations	Low

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Risk of potential information leakage where data processing / storage sites are shared	Low/Medium	• All data is encrypted at rest and in transit using 256 bit SSL encryption. All Arbor servers are situated in secure locations • All Arbor servers situated in secure locations. • Physical security maintained within both school and Arbor offices use access controls.	Low
School being unable to comply with Individual Rights Requests	Low	• Arbor has the functionality to facilitate availability, amendment, deletion and extraction of personal data if required.	Low
Data being retained for longer than is necessary	Low	• Arbor will automatically flag records that have passed the school's data retention period, meaning the school can easily find and remove all students (and staff) who left the school after a certain period. Arbor also has a Student and Staff Data Retention Dashboard, making it easy to find data that has breached the data retention period	Low

SECTION 6 – Sign off

Authorisation should be sought from the GDPR lead in school or your Headteacher.		Authorised by	
		Name	Role
Is data collection/sharing proposed lawful, appropriate and not excessive?	Yes	Graham Sullivan	Headteacher
Have all reasonable steps been planned or taken to minimise risks?	Yes	Graham Sullivan	Headteacher
Have any residual risks been approved?	Yes	Graham Sullivan	Headteacher

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