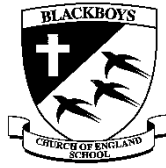


Blackboys C.E. School
School Lane
Blackboys
Uckfield
East Sussex
TN22 5LL



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

Data Protection Impact Assessment

My Concern

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.

Data Protection Impact Assessment for – My Concern – 22.11.2019

Do I need to complete a DPIA?

- see DPIA Screening Flowchart (in Appendix 1 of the **DPIA Guidance**).

For help completing this DPIA

- see **DPIA Guidance**

Project Details	
Name of Project/Activity	My Concern Safeguarding Software
Project Manager/Activity Lead	Project Manager/Activity Lead
Service Area Lead (Information Asset Owner IAO)	Graham Sullivan
Project Reference Number (if applicable)	N/A
Document Creation Date	28/1/25

Version control	
28/1/25	V1 – Created by Federation
Date	Version
Date	Version
Date	Version

SECTION 1 - Background

State in the text box below why a DPIA is required - see separate DPIA Guidance for examples. You may find it helpful to refer or link to other documents, such as a project proposal.

Background

DPIA is required as a new system to easily record, manage and report safeguarding concerns for pupils. This will allow secure reporting and remove paper copies and the need for future storage of files on site. As this system is likely to process large volumes of personal data, some of it is likely to be sensitive and/or special category data, it was decided that a DPIA was required.

SECTION 2 - Description of processing

In the table below, describe the purposes of the processing by clearly outlining the reason for data processing/sharing, including:

- The consequent benefit to service delivery
- The intended effect on individuals
- Benefits to stakeholders
- Benefits to the wider organisation
- Benefits to society

Where the purpose of processing relates to Law Enforcement, please contact your GDPR lead in school or DPO - you may be required to provide supplementary information to append to this DPIA.

Purpose of the processing

- To record causes for Safeguarding concerns; to set follow-up tasks for staff in order to monitor and support vulnerable children. To run reports. Manage pupil records. Have an audit trail. To provide evidence and information for social services.
- To enable the school to demonstrate that it is complying with relevant safeguarding legislation, e.g. "Keeping Children Safe in Education".

Scope of Processing

Information/Data to be processed

Personal Data		
Name	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Address	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Date of birth	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Gender	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Marital status	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Telephone number	<input checked="" type="radio"/> Yes <input type="radio"/> No	
Email address	<input checked="" type="radio"/> Yes <input type="radio"/> No	
IP address	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Location based data	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Financial information	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Other unique identifier	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, state type of unique identifier

Special Category (Sensitive) Data		
Racial or ethnic origin	<input checked="" type="radio"/> Yes <input type="radio"/> No	For monitoring purposes
Political opinions	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, state why required
Religious or philosophical beliefs	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, state why required

Trade union membership	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, state why required
Mental health	<input checked="" type="radio"/> Yes <input type="radio"/> No	In order to provide accurate and detailed information relating to Safeguarding. In order to ensure appropriate and effective support is put in place.
Physical health	<input checked="" type="radio"/> Yes <input type="radio"/> No	In order to provide accurate and detailed information relating to Safeguarding. In order to ensure appropriate and effective support is put in place.
Sexuality	<input checked="" type="radio"/> Yes <input type="radio"/> No	If a child's perceived sexuality is relevant to behaviour concerns or support that is required, it will be appropriate to include.
Criminal offences	<input checked="" type="radio"/> Yes <input type="radio"/> No	In order to protect the child.
Genetic data	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, state why required
Biometric data	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, state why required

Volume of Data to be processed	
Number of people affected	<input type="radio"/> 0-20 <input type="radio"/> 21-100 <input checked="" type="radio"/> 101-1,000 <input type="radio"/> 1,001+

Frequency of data collection and use	
How often will data be collected?	Daily
How often will data be used?	Daily

Data Flow

Describe the journey the data takes

Where possible, refer to a data flow diagram - see DPIA Guidance for an example

Outline how the personal information will flow between teams/organisations/systems etc. from collection through to deletion including:

- How will you collect, use, store and delete data? Data will be collected by the school and held on the SIMS database.
- My concern syncs to the information held in SIMS so that only the relevant data needed is transferred. This data should be relevant and up to date as systems are in place to ensure data held in SIMS is accurate and up to date.
- New information will be uploaded directly on to My Concern by staff regarding causes for concern. Information may be passed on to other Safeguarding Leads, Social Workers, Government and Law Enforcement agencies, as well as Core Group meetings, Case Conferences.
- [This data will be retained within MyConcern in line with the school retention schedule](#)

Parties involved in processing

Outline with whom the information will be shared and why - see DPIA Guidance.

Organisation or individual	Status i.e. Data Controller (DC) or Data Processor (DP)	Reason for processing
School	DC	Safeguard Children, Statutory Duty, Improve outcomes for children.
My Concern	DP	To provide a secure online system for safeguarding children.

Information sharing

If not included in section above, outline where information is shared with others. See DPIA Guidance for examples of those with whom information might be shared and potential access methods.

Organisation or individual	Reason for sharing	Method for sharing/ access controls	Frequency
Social Services will receive chronologies and summaries of actions taken	To protect the child and to show impact of support	Reports generated from the system	As required in order to give information at Core group and Case Conferences
Governing Body	To give an overview of trends across the school in terms of Safeguarding requirements, training accessed	Reports generated from the system	6 times a year

Context of the processing

Describe the relationship with the individuals whose data will be processed	Parents and pupils
How much control will the data subject have over the use of their information?	Limited control
Would the data subject expect their information to be used in this way?	Yes
Are the data subjects children and/or vulnerable?	Yes, children
Have there been any prior concerns (public and/or internal) over this type of processing?	No
Is the processing in any way novel? Eg use of new/untested technology, an innovative new initiative not tried elsewhere.	No

Is the processing transparent or covert?	Transparent
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SECTION 3 - Consultation

In the tables below, describe when and how you will seek individuals' views of the processing and any potential risks – or justify why it's not appropriate to do so in the last of the three following tables.

External stakeholders		
Stakeholder	When and how views sought	Impact
Local authority, supplier – My Concern	Meeting/Telephone conversation	
Eg data subjects, local authority departments, central government departments, suppliers	Eg survey, focus group, meeting	List any potential impact or concern

Internal stakeholders		
Stakeholder	When and how views sought	Impact
Senior Management, IT technicians, Safeguarding Leads, Governors	Meeting	System working well across Federation

SECTION 4 – Assessment of necessity and proportionality

This section assesses in detail, compliance with Data Protection Legislation in relation to the processing of personal data outlined in the previous sections.

DPIA Compliance Checklist	
Why can the objective not be achieved without processing personal data?	It needs to link with Arbor in order to have information regarding children and parent contact information to record any safeguarding issues. If the data was anonymised it would not be possible to record data against the correct child, or contact the correct parent.

Why can the objective not be achieved by anonymising data?	As above, it is not possible without knowing the personal pupil/pupil data.
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Principle 1: Article 5 (1) a. Lawfulness, fairness and transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

For any processing of personal data, complete Table 1. Where processing includes special category data (see Section 2 above) also complete Table 2. Select the most appropriate legal basis that will be relied upon for the processing in the DPIA.

Table 1: Personal Data	
Legal Basis (Lawfulness)	
Consent has been (will be) obtained and maintained	<input type="radio"/> Yes <input checked="" type="radio"/> No
A contract with the data subject is (will be) in place covering the processing of specified personal data	<input type="radio"/> Yes <input checked="" type="radio"/> No
The school has a legal obligation to process the data	<input checked="" type="radio"/> Yes <input type="radio"/> No
Data will be shared/processed in the vital interests of the data subject (or another individual) where there is threat to life	<input type="radio"/> Yes <input checked="" type="radio"/> No
The school has statutory authority to process the data	<input checked="" type="radio"/> Yes <input type="radio"/> No
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 school	<input type="radio"/> Yes <input checked="" type="radio"/> No

Legal Basis (Lawfulness) – Legitimate Interest*

* Consult with your GDPR lead /DPO to see if this will apply – this legal basis can't be used where the school is carrying out a school activity authorised by statute or in performance of a public task or exercise of official authority vested in the school.

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.	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, provide justification for use
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Table 2: Personal Data (Special Category)

Legal Basis (Lawfulness)		
Explicit consent has been (will be) obtained and maintained	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Processing is necessary to carry out obligations in the field of employment and social security	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Data will be shared/processed in the vital interests of the data subject where there is threat to life and the data subject is physically or legally incapable of giving consent	<input type="radio"/> Yes <input checked="" type="radio"/> No	
The data subject has already manifestly made the information public	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Processing is necessary for defence of a legal claim	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Processing is necessary for reasons of substantial public interest	Yes	
Processing is necessary for delivery of health or social care services	Yes	
Processing is necessary for protecting against serious public health implications	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Storage is necessary for archiving purposes	<input type="radio"/> Yes <input type="radio"/> No	

Fairness		
Would the data subject reasonably expect their information to be used in this way?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Parents are aware via the school prospectus and privacy notice that we are required to process their information in relation to Safeguarding

<p>Is any individual likely to be damaged by processing the information?</p> <ul style="list-style-type: none"> - Is there any likelihood of data subjects suffering financial loss, physical harm, significant emotional or mental pain as a result of data processing? 	<input type="radio"/> Yes <input checked="" type="radio"/> No	Notes
<p>Will the proposed use of personal data infringe the right to privacy under Article 8 of the Human Rights Act?</p> <ul style="list-style-type: none"> - Article 8 of the Human Rights Act includes reference to: respect for private and confidential information, respect for privacy when one has a reasonable expectation of privacy and the right to control the dissemination of information about one's private life, including photographs taken covertly 	<input type="radio"/> Yes <input checked="" type="radio"/> No	Notes

Transparency		
<p>Is processing (including sharing) transparent? How will individuals be notified about the use of their personal data?</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No	Privacy Notice

Consent	
<p>If consent is required to process personal data, how will this be collected and what happens if consent is withheld or withdrawn?</p>	Consent is not required as personal data is processed as part of Safeguarding

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

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

<p>Are all the purposes for processing personal data covered here?</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No	Notes
<p>Has any personal data been obtained for one purpose and then will be used for a new different purpose in this project?</p>	<input type="radio"/> Yes <input type="radio"/> No	Notes

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

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Is the data being processed limited to the minimum required to fulfil the purpose?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Notes
Is the data being processed of adequate quality to fulfil the purpose?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Notes
Is more data than is required being shared with any 3rd party?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Law Enforcement Agencies, Social Workers, Safeguarding Staff

Principle 4: Article 5 (1) d. Accuracy

Personal data shall be accurate and, where necessary, kept up to date; and every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

How is the accuracy of any data to be processed ensured?	Parents update the school with any changes in information for the family and child. These changes will be made on SIMS and this will then automatically updated on My Concern.	
Do systems (where relevant) allow data to be amended when required?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Contact details will be changed as required

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

Personal data shall be kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.

How long will the personal information be held for?	As per Federation retention schedule
	No personal data will not be retained for the purposes of archiving in the public interest.

How will information be deleted (or anonymised) when retention periods are reached?	Information will be transferred to subsequent schools. No personal data related to Safeguarding will be retained unless the child leaves the UK and there is no receiving school identified. In this case, personal data will be retained until the child is 25.
Do software/systems allow deletion of information in line with retention periods?	Yes

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

Personal data shall be processed in a manner that ensures appropriate security of the personal data, 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 is limited to authorised users only. The Safeguarding Lead will authorise access and monitor and audit.
How can we evidence that anyone who will have access to the personal data complies with the appropriate IG standards?	Appropriate training received. Data protection policy read.
Has an ICT security Risk Assessment been completed (where applicable) and acted upon?	No
Where a third party is involved in hosting and/or processing data, what measures are in place to ensure compliance with Data Protection Legislation?	

International Transfers

Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Will the activity require processing, transfer, storage and/or access to personal data outside of the UK?	<input type="radio"/> Yes <input checked="" type="radio"/> No	If yes, provide details
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Will the activity require processing, transfer, storage and/or access to personal data outside of the EU?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> No	If yes, provide details and add as a risk in Section 5
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Data Subject Rights

See DPIA Guidance for information on types of data subject requests and legal requirements regarding response to requests.

How will the systems/processes allow ease of response to requests to exercise the data subject rights below?	Response
Subject Access Right	
Right to Erasure	As the school has a legal obligation to process personal data in relation to safeguarding, it is unlikely the right to erasure will apply.
Right to Object	As the school has a legal obligation to process personal data in relation to safeguarding, it is unlikely the right to object will apply.
Right to Portability	As the data has not been provided directly by the data subject, the right to portability does not apply.
Right to Rectification	The data in the system can be rectified if it is incorrect. However as the school has a legal obligation to process personal data in relation to safeguarding, it is unlikely the right to rectification will apply in all circumstances.
Right to Restriction	As the school has a legal obligation to process personal data in relation to safeguarding, it is unlikely the right to restriction will apply in most circumstances.

Where automated decisions including profiling are being made, will provision be made to allow data subjects to exercise their right to object?	No automated decision making/profiling is made using this data.
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SECTION 5 - Assessment of Risk

See DPIA Guidance on how to complete the following table.

Risk	Likelihood of harm	Impact (severity of harm)	Overall risk score	Mitigation	Residual risk score where mitigation is in place
If data is incorrect this may mean the school is unable to contact a parent or contacts the wrong parents.	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low	Data is pulled through from SIMS and this data is checked annually with parents.	<input type="radio"/> High <input type="radio"/> Medium <input type="radio"/> Low
Data breach due to wrong information being held	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low	Data is pulled through from SIMS and this data is checked annually with parents.	<input type="radio"/> High <input type="radio"/> Medium <input type="radio"/> Low
Access to data by unauthorised parties	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	Password protected access. Limited access to staff members (as required by role). Additional staff training.	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low
Data processed by external third party (My Concern)	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low		<input type="radio"/> High <input type="radio"/> Medium <input checked="" type="radio"/> Low

SECTION 6 – Sign off

		Authorisation required by GDPR lead in school / Head Teacher / DPO. For residual risks that score 'high', DPO approval must be obtained, who will decide whether there is a need for approval by the ICO.	Authorised by
Is data collection/sharing proposed lawful, appropriate and not excessive?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Headteacher	G Sullivan
Have all reasonable steps been planned or taken to minimise risk and enhance confidentiality?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Headteacher	G Sullivan
Residual risks approved?	<input type="radio"/> Yes <input type="radio"/> No	Headteacher	G Sullivan

Summary of DPO Advice (if given)	Confirm data protection measures in place with My Concern and ensure that they are reflected in the DPIA, as per comments above.	
DPO advice	Accepted/Overruled	If overruled, give reason

DPIA Review Date	<input type="radio"/> Yes <input type="radio"/> No
Information Asset Owner responsible for review	Name of Information Asset Owner