

Data Protection Impact Assessment (DPIA)

This template is an example of how you can record the DPIA process and results. You can start to fill in details from the beginning of the project, after the screening questions have identified the need for a DPIA.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Submitting controller details

Name of controller	HBC, Schools & Academies
Subject/title of DPO	Transition to Secondary School
Name of controller contact /DPO (delete as appropriate)	Jacqui Braithwaite/Kay Forgie/Laura Stones

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

The project seeks to improve transitions, initially the key transition from Primary School to Secondary School. The project has 2 main elements:

- The development of a 'Transition Planning – Profile Tool' to be used universally across the whole year group of children. This is a 'broad brush' tool that make it easy to see, in a very visual way, areas of strength and areas of vulnerability. The information will be used to plan interventions that will support transition. Interventions could be about learning, promoting academic resilience, social skills, independence, family support etc. Primary schools already know their children and plan accordingly but the intention is that the tool will make this existing process more efficient and more effective
- If the tool identifies a need for further collaborative planning the parents/carers would be invited to attend a person-centred planning meeting which is a very respectful process that keeps the child and family at the centre of the planning and decision making. The welcoming Secondary School would be invited to these meetings at the appropriate time with parental consent

The DPIA is needed as there may be some privacy concerns as some information that is sensitive is nevertheless important for secondary schools to know (obviously only relevant staff would know). Examples include:

- Child's health
 - Family circumstances
- etc

The tool is all about understanding the risks and providing appropriate support to minimize the risk and prevent escalation. The minute details may not be necessary just understanding the areas of vulnerability.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

The process is as follows:

- Primary Schools complete an excel spreadsheet. They provide data against indicators that may have an impact on a successful transition. Indicators include, attendance, attainment, SEND, health, family circumstances, safeguarding, social and emotional development etc. They use this information themselves to start preparing for the transition throughout year 6. The intention is for parents/carers to be fully involved in this process. Parents will give signed consent for the information to be collated and used to plan interventions to aid a smooth transition.
- For some children there will be a person-centred planning meeting involving parents and all relevant parties (with parent's permission). For other children there will not be any need for a meeting but there may be more detailed professional conversations between the schools to aid planning (eg Senco to senco or Parent Support Adviser to Safeguarding lead)
- The intention is that the information will be collated early in the Autumn Term of Year 6. Some Local Authority officers within The Virtual School and Psychology Team will be given access to the information in order to help plan and deliver appropriate interventions.
- As soon as possible after Secondary School Offer Day in March the information will come into the Local Authority from Primary Schools with parental permission. The Local Authority will sort the data and send to the correct secondary school. The Local Authority will also use the data at cohort level to help identify common needs and help with strategic planning of interventions and commissioned services.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

Please see TPPT spreadsheet and guidance document

Describe the context of the processing:

What is the nature of your relationship with the individuals?

- Parent / teacher relationships
- School to school relationships

How much control will they have?

- Parents will understand the process and have the opportunity to input their ideas and concerns into the spreadsheet and subsequent planning meetings

Would they expect you to use their data in this way?

- Parents expect information to be shared with secondary schools, if anything they get upset if relevant information is not shared

Do they include children or other vulnerable groups?

- The tool helps to identify children in vulnerable group eg SEND, LAC, EAL

Is it novel in any way?

- No it is just an excel spreadsheet with conditional formatting to make it more visual

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The purpose of the project is to use existing data more effectively to ensure a better transition into secondary school. It is intended that early identification and early intervention will have a significant impact but in a very good way in terms of holistic progress in secondary school (socially, emotionally, academically etc)

It is hoped that this more formal process will make information sharing safer and more robust avoiding ad-hoc conversations without parental knowledge or consent.

Step 3: Consultation process

To date consultation has taken place with:

- Headteachers and school staff who are all highly in favour of a more efficient and consistent manner of sharing information
- 50+ school governors (many of them parent governors) who made helpful suggestions towards the development of the tool (wanting health to have greater prominence. Several of the governors identified their own children as pupils who would benefit from this and many offered to be part of the pilot.
- Future consultation are planned with existing parent forums eg SEND parents forum, Young Carers etc Future consultations are also planned with children to find out what they think would be helpful

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

- The lawful basis for sharing transition data for maintained schools is covered by The Education (Pupil Information) (England) Regulations 2005.
- Data quality is ensured by:
 - Team approach to completion
 - Format of spreadsheet (conditional formatting, locked cells to protect formulae, technical guidance)
- Data is kept to a minimum, the tool highlights there is a vulnerability risk and does not go into any detail about the specifics
- The comments box indicates who need to talk to who, further information shared on a need to know basis with parental consent and preferably present in the meeting.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
<ul style="list-style-type: none"> • Parental consent is not informed consent 	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
<ul style="list-style-type: none"> • Schools share information with Local Authority without consent 	possible	Depends on what is shared	Medium
<ul style="list-style-type: none"> • Information goes to the wrong secondary school 	possible	Significant to reputation if LA is fined	Medium
<ul style="list-style-type: none"> • Information goes to the wrong secondary school 	possible	minimal	low

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Effect on risk Eliminated reduced accepted	Residual risk Low medium high	Measure approved Yes/no
Parental consent is not informed consent	<ul style="list-style-type: none"> Information for parents to sign concise and in plain English 	Reduced	Low	Yes
	<ul style="list-style-type: none"> Hyperlinks within the consent form take parents to more detailed information. Again this information is in an accessible format 	Reduced	Low	Yes
	<ul style="list-style-type: none"> The whole process is discussed with parents, questions answered at the first year 6 parents evening where signed consent is sought 	Reduced	Low	Yes
Schools share information with Local Authority without consent	<ul style="list-style-type: none"> A consent column will be part of the spreadsheet. The conditional formatting will mean that if this box is left blank or is 'N' for no consent then it is not possible to populate the other boxes with information 	Reduced	Low	Yes
Information goes to the wrong secondary school	<ul style="list-style-type: none"> This risk is massively reduced by it first coming into the Local Authority for sorting 	Reduced	Low	Yes
	<ul style="list-style-type: none"> Parents will have given informed consent to the <u>early</u> sharing of information in March (before all appeals have been completed) which may lead to a minute number of children having their data in the wrong school. If an 	Reduced	Low	Yes

	appeal is successful but the information has already gone to a different school it will immediately be deleted from their systems			
Information is incorrect / un-validated	<ul style="list-style-type: none"> The vast majority of the data is factual eg attendance data, attainment data 	Reduced	Low	Yes
	<ul style="list-style-type: none"> The guidance document helps schools to describe vulnerabilities in factual ways that are observable rather than the views of one individual eg the behavioral presentation of the child or the child's approach to learning 	Reduced	Low	Yes
	<ul style="list-style-type: none"> The information is compiled by a team within the school eg head, senco, year 6 teacher, parent support adviser. Such an approach should minimize the risk of mistakes or mis-information 	Reduced	Low	Yes

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Corporate Information Governance Group – 9 th November 2020	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Corporate Information Governance Group – 9 th November 2020	If accepting any residual high risk, consult the ICO before going ahead

DPO advice provided:	Agreed at Corporate Information Governance Group – 9 th November 2020	DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>Summary of DPO advice: Discussion took place with DPO during development and completion of DPIA.</p>		
DPO advice accepted or overruled by:	Accepted	If overruled, you must explain your reasons
<p>Comments:</p>		
Consultation responses reviewed by:	Jacqui Braithwaite	If your decision departs from individuals' views, you must explain your reasons
<p>Comments:</p>		
This DPIA will kept under review by:	Corporate Information Governance Group	The DPO should also review ongoing compliance with DPIA