

# Data Privacy Impact Assessment

**Name of Academy/Trust:** Leger Education Trust (Campsmount Academy, Spa Academy, Littlemoor Infant Academy, Moss Road Infant Academy).

**Pupils On Roll:** 1299

**Staff On Roll:** 171 FTE

**Data Action/Project:** To ensure that data protection principles are adhered to when using Wonde to port data and order FSM vouchers.

**Data Protection Officer:** Tim Pinto

**Data Protection Lead:** Rebecca Grange, Director of Operations

**Date:** 24/03/21

## 1. RISK ANALYSIS OF DATA PROJECT

<p><b>Aim of project</b></p>	<p>To help deliver a cost effective solution to meet the needs of the business.</p> <p>Wonde enables accessibility to personal data from the school's Management Information System to deliver a variety of apps and services on behalf of the school. As such Wonde ensures information security and enables the school to manage what access is given to personal data hosted on the school's Management Information System. As the data controller it is important that Leger Education Trust controls exactly what data is shared with each application.</p> <p>Wonde is a provider of online platforms and Application Program Interfaces (API)* which are simple, smart, and secure and gives schools more control and visibility of their own data and provides additional tools.</p> <p>*An Application Program Interface (API) is a set of routines, protocols, and tools for building software applications. An API specifies how software components should interact.</p> <p>Leger Education Trust will undertake the following processes:</p> <ol style="list-style-type: none"> <li>1. Collecting personal data</li> <li>2. Recording and organizing personal data</li> <li>3. Structuring and storing personal data</li> <li>4. Copying personal data</li> <li>5. Retrieving personal data</li> <li>6. Deleting personal data</li> </ol> <p>By opting for a cloud based solution the school aims to achieve the following:</p> <ol style="list-style-type: none"> <li>1. Scalability</li> <li>2. Reliability</li> <li>3. Resilience</li> <li>4. Delivery at a potentially lower cost</li> <li>5. Supports mobile access to data securely</li> <li>6. Update of documents in real time</li> <li>7. Good working practice, i.e. secure access to sensitive files</li> </ol>
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<p><b>Why does a DPIA need to be completed?</b></p>	<p>Wonde provides the school with the tools to securely share data stored in the Management Information System (MIS) with third party applications (apps).          Through Wonde, schools can better manage suppliers and control exactly what data is shared with each application. The school uses apps powered by Wonde and has its own dedicated account.          Wonde connects Winter Food Vouchers to the school's MIS.          It then transfers the personal information from the school's MIS to Winter Food Vouchers.          Winter Food Vouchers are then kept up-to-date, as every time a school makes changes on their MIS, it will automatically change in Winter Food Vouchers after the overnight sync.          Wonde also provides Single Sign ON (SSO). SSO means that pupils are able to access their Winter Food Vouchers account through Wonde, along with any other applications used by the school. Pupils will only need to log into the one portal and no longer require separate usernames and passwords for each application.          For SSO, the students are able to use a QR badge or an emoji code provided by Wonde.          The cloud service provider cannot do anything with the school's data unless they have been instructed by the school. The schools Privacy Notice will be updated especially with reference to the storing of pupil and workforce data in the cloud.</p>
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## 2. DATA PROTECTION PROCEDURES

<p><b>How will you collect, use, store and delete data</b></p>	<p>The Privacy Notices (Pupil and Workforce) for the school provides the legitimate basis of why the school collects data. The information collected by the school is retained on the school's computer systems and in paper files. The information is retained according to the school's Data Retention Policy.</p>
<p><b>What is the source of the data?</b></p>	<p>Pupil information is collected via registration forms when pupils join the school, pupil update forms the school issue at the start of the year, Common Transfer File (CTF) or secure file transfer from previous schools.</p>
<p><b>Will you be sharing data with anyone?</b></p>	<p>Leger Education Trust routinely shares pupil information with relevant staff within the school, schools that the pupil attends after leaving, the Local Authority, the Department for Education, Health Services, Learning Support Services, RM Integris and various third party Information Society Services applications.</p>
<p><b>What types of processing identified as likely high risk are involved?</b></p>	<p>Leger Education Trust 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.</p>
<p><b>What is the nature of the data?</b></p>	<p>Wonde will have access to the school's Management Information System. The school's MIS contains pupil data relating to personal identifiers and contacts (such as name, unique pupil number, contact details and address).</p>

<p><b>Special Category data?</b></p>	<p>Characteristics (such as ethnicity, language, nationality, gender, religion, data of birth, country of birth, free school meal eligibility). Special education needs, safeguarding information, medical and administration (doctor's information, child health, dental health, allergies, medication and dietary requirements). Attendance information, assessment, attainment and behavioral information. The school also obtains data on parents/guardians/carers including their name, address, telephone number and e-mail address.</p> <p>The school's MIS may also contain workforce data relates to personal information (such as name, address and contact details, employee or teacher number, bank details, national insurance number, marital status, next of kin, dependents and emergency contacts). Special categories of data (such as gender, age, ethnic group). Contract information (such as start dates, terms and conditions of employment, hours worked, post, roles and salary information, pensions, nationality and entitlement to work in the UK). Work absence information, information about criminal records, details of any disciplinary or grievance procedures. Assessments of performance (such as appraisals, performance reviews, ratings, performance improvement plans and related correspondence). Information about medical or health conditions.</p> <p>Data used by Wonde will include personal information. This may include information such as the pupil's first and last name, e-mail address and what school they're attached to. Providing this data will enable schools to access Wonde and for Wonde to access the school's Management Information System.</p> <p>– Some of the personal data collected falls under the GDPR special category data. This includes race; ethic origin; religion; biometrics; and health. These may be contained in the Single Central Record, the school's MIS, child safeguarding files, SEN reports, etc.</p> <p>Wonde may collect data, for example, for the provision of a free school meal service which may include special category data relating to health and religion.</p>
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### 3. CONSULTATION PROCESS

How have individuals' views been sought?	We have contacted all parents via email and letter regarding FSM vouchers.
Have governors been briefed?	Regular briefings to governors include data protection updates.
Are other processors involved?	Yes, we will seek assistance from any data processors that are included in events where staff access data remotely.

#### 4. DATA NECESSITY AND PROPORTIONALITY

<p><b>What is your lawful basis for processing?</b></p>	<p>The lawful basis for processing personal data is contained in the school's Privacy Notice (Pupil and Workforce). The Legitimate basis includes the following:</p> <ul style="list-style-type: none"> <li>• Childcare Act 2006 (Section 40 (2)(a))</li> <li>• The Education Reform Act 1988</li> <li>• Further and Higher Education Act 1992,</li> <li>• Education Act 1994; 1998; 2002; 2005; 2011</li> <li>• Health and Safety at Work Act</li> <li>• Safeguarding Vulnerable Groups Act</li> <li>• Working together to Safeguard Children Guidelines (DfE)</li> </ul> <p>The school has a Subject Access Request procedure in place to ensure compliance with Data Protection Law</p>
<p><b>Does the processing actually achieve your purpose?</b></p>	<p>The school provides education to its students with staff delivering the National Curriculum</p> <p><b>What is the nature of your relationship with the individuals?</b> – Leger Education Trust collects and processes personal data relating to its pupils and employees to manage the parent/pupil and employment relationship.</p> <p>Through the Privacy Notice (Pupil/Workforce) Leger Education Trust is committed to being transparent about how it collects and uses data and to meeting its data protection obligation.</p>
<p><b>Is there another way to achieve the same outcome?</b></p>	<p>Due to the pandemic, the vouchers have to be processed electronically.</p>
<p><b>How will you prevent function creep?</b> This means the gradual widening of the use of a technology or system beyond the purpose for which it was originally intended, which may lead to potential invasion of privacy.</p>	<p>This is not known at present.</p>
<p><b>How will you ensure data quality and data minimisation?</b></p>	<p>N/A.</p>
<p><b>What information will you give individuals?</b></p>	<p>Access to the files will be controlled by username and password. Wonde is hosting the data and has the ability to access data on instruction of Leger Education Trust who is the data controller for the provision of supporting the service delivery.</p>
<p><b>How will you help to support their rights?</b></p>	<p>The DPO regular reminds schools/trusts about their obligations of protecting data.</p>
<p><b>What measures do you take to ensure processors comply?</b></p>	<p>N/A</p>
<p><b>How do you safeguard any international transfers?</b></p>	<p>N/A</p>

## 5. IDENTITY AND ASSESS RISKS

This looks at the potential risks associated on individuals.


No:	Risk if paper or electronic systems containing personal data are accessed by unauthorised persons	Likelihood of harm	Severity of harm	Overall risk
1	Data transfer; data could be compromised	Possible	Severe	Medium
2	Asset protection and resilience	Possible	Significant	Medium
3	Data Breaches	Possible	Significant	Medium
4	Subject Access Request	Probable	Significant	Medium
5	Data Retention	Probable	Significant	Medium

## 6. IDENTIFY MEASURES TO REDUCE RISK

This looks at ways to reduce risk set out in Section 5

No:	Options to reduce risk or eliminate risk	Effect on risk	Residual Risk	Measure communicated
1	<b>Data Transfer</b> Secure network, end to end encryption	Reduced	Medium	Yes
2	<b>Asset protection &amp; resilience</b> Data Centre in EU, Certified, Penetration Testing and Audit	Reduced	Medium	Yes
3	<b>Data Breaches</b> Documented in contract and owned by school	Reduced	Low	Yes
4	<b>Subject Access Request</b> Technical capability to satisfy data subject access request	Reduced	Low	Yes
5	<b>Data Retention</b> Implementing school data retention periods in the cloud	Reduced	Medium	Yes

## 7. STEP 7: SIGN OFF AND RECORD OUTCOMES

Position:	Name:	Signed:
Chief Executive	Adam Dale	
Chair of Directors:	Babs Lynds	
IT Manager:	Simon Nicholson	
DP Lead	Rebecca Grange	
DPO:	Tim Pinto	