

DATA PROTECTION IMPACT ASSESSMENT

Name of School: Bounds Green School

Assessment Carried Out By: Faye Papini

Reviewed By DPO On: 13/01/2020

Name and Aim of Project/Technology/System

Schoolvouchers.com by Wonde.

Provision of Free School Meal vouchers direct to parents.

Personal Data Used by Project/Technology/System

Schoolvouchers.com uses the Wonde data transfer tool to extract FSM children's records from our MIS SIMS, and the contacts of their parents/carers to send them the FSM vouchers.

The fields read/exported include Student name, class, FSM status, Parent/carer contact name, mobile number, email address, and parental responsibility status.

Purpose of Processing

To provide FSM vouchers to parents/carers. This is part of the schools legal obligation and public task.

Steps taken to protect data

DATA PROTECTION IMPACT ASSESSMENT

Steps Taken By Wonde

Data will be transferred electronically (https) using the Wonde data transfer tool.

Only the data necessary to distribute vouchers (as set out above) will be transferred.

Data transferred and held securely. Wonde privacy details can be found on their website and include detailed privacy notice setting out individual rights.

Steps Taken By The School

- Data only provided to Wonde on instruction from the school. The data will only be held on Wonde as required by the school.
- Training has been delivered to relevant staff
- Access to Wonde is permitted to School Business Services (our IT support) in order to ensure the links between our management information system (SIMS) and Wonde is maintained through the school's server.
- Access to Wonde administration portal is limited to selected members of the admin team
- Access to the voucher sections is limited to select staff only.
- When voucher orders are placed, the person ordering vouchers will check FSM information on SIMS before sending (to minimise risk of breaches).
- Access to school voucher section is secured by a request for a magic link code which is sent to a verified email address

Provision of vouchers and use of this scheme will be kept under review Currently FSM vouchers need to be distributed due to Covid pandemic. Should the need cease Wonde's access to FSM section will be removed.

The school has reviewed the following documents

<https://www.wonde.com/downloads/Wonde%20-%20School%20Data%20and%20GDPR.pdf>

[https://www.wonde.com/downloads/installs/Capita%20SIMS%20\(Integration%20and%20Requirements%20Guide\).pdf](https://www.wonde.com/downloads/installs/Capita%20SIMS%20(Integration%20and%20Requirements%20Guide).pdf)

<https://www.wonde.com/downloads/Wonde%20-%20Data%20protection%20policy.pdf>

<https://www.wonde.com/downloads/Wonde%20-%20Data-Breach-Policy.pdf>

Impact And Risks

DATA PROTECTION IMPACT ASSESSMENT

School Assessment of Risk		
	Risk Level	Comments
Likelihood of harm to data subject	Unlikely	
Severity of harm (regardless of likelihood)	Significant	Wonde harvests a lot of personal information in order to conduct FSM voucher processing
Overall risk (taking into account measures to reduce risk above)	Low	
DPO Assessment of Risk		
Likelihood of harm to data subject	Unlikely	
Severity of harm (regardless of likelihood)	Significant	FSM information more than basic identifiers.
Overall risk (taking into account measures to reduce risk above)	Low	

DATA PROTECTION IMPACT ASSESSMENT

School Compliance Statement

I can confirm that this data protection impact assessment has been completed to the best of my knowledge and that the software complies with the data protection principles under the GDPR. All privacy risks and solutions have been considered and represent a proportionate response to the identified risks to personal data.



Signed:

Date: 18/01/2020

DPO Statement

I can confirm that I have reviewed the DPIA above and are satisfied that the school have taken appropriate and proportionate steps to protect the data.

Signed: PP.JSuldecka for and on behalf of Judicium Consulting Ltd

Date: 18/01/2020

Judicium Education
Judicium Consulting Ltd
72 Cannon Street
London EC4N 6AE



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