

# **DATA PROTECTION IMPACT ASSESSMENT** **(DPIA)**



**Name of School: Bounds Green School**

**Assessment Carried Out By: Faye Papini**

**Reviewed By DPO On: 24<sup>th</sup> November 2021**

## **1.Name and Aim of Project/Technology/System**

Little Wandle Letters and Sounds

<https://www.littlewandlelettersandsounds.org.uk/>

Little Wandle Letters and Sounds Revised is a complete systematic synthetic phonics programme (SSP) provide a complete teaching programme meeting all the expectations of the National Curriculum.

## **2.Personal Data Used by Project/Technology/System**

Little Wandle Letters and Sounds process:

- Pupil Names;
- Unique Pupil Numbers (UPNs);
- Reading Assessments for pupils;
- Wandle TSA Letters and Sounds Assessment data;
- Name and Contact details of person who signed up with Little Wandle; and
- Teacher names.

## **3.Purpose of Processing**

The school has a task as a taxpayer funded educational establishment. As part of the public task as a school, a curriculum must be provided in English Literacy and reading, as well as measures put in place to help struggling pupils to develop in this area.

Little Wandle Letters and Sounds assists children with their letters and sounds, and forms part of the national curriculum. Therefore, this is the legal basis for which the school will share pupil's data with the system.

#### **4.Steps taken to protect data**

Little Wandle Letters and Sounds stores data for an appropriate length of time, and Little Wandle destroy information two years after the school have finished their contract with them. Although this is a bit long, the school can request that information is deleted as soon as they finish their licence period.

Little Wandle do share data with third parties, but they only do this if they are 1) legally required to and 2) if these third parties have sufficient security in place such as Standard Contractual Clauses (SCCs).

- Employees who have access to sensitive data are DBS checked.
- Access to sensitive information is protected by username and password. All user passwords are encrypted.
- There is a strict information security policy in place, which all employees and subcontractors sign.
- Data is only used for the purposes specifically agreed with the school, and not for marketing purposes.
- Data is only retained for as long as it is required to provide a service.

#### **Steps taken by the School:**

- Safeguarding protocols are in place and communicated to staff to ensure security of the data.
- Users (staff and students) must have a unique username and password;
- Passwords are changed regularly; passwords are required to be complex (management of passwords through guidelines to staff, pupils and parents regarding minimum password complexity requirements and timescales for changing passwords);
- The school have implemented retention procedures following their retention policy;
- A full suite of training will be provided to staff regarding the software and how it can best be used securely to prevent personal data being compromised within the system;
- To ensure the members of staff that are granted access to the software are limited to those that require access;
- Regular Security Reviews;
- Reducing the scope of the data where possible; and
- Choosing not to process special category data.

#### **Data breaches:**

The School have a Data Breach Policy in place. Should a data breach arise, the School will inform their DPO without undue delay to assess the risk, and to assess whether the breach is reportable to the ICO.

#### **5.Impact And Risks**

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<b>School Assessment of Risk</b>		
	<b>Risk Level</b>	<b>Comments</b>
Likelihood of harm to data subject	Unlikely	Reading assessment data only collected
Severity of harm (regardless of likelihood)	Minimal	
Overall risk (taking into account measures to reduce risk above)	Low	
<b>DPO Assessment of Risk</b>		
Likelihood of harm to data subject	Unlikely	Only reading assessment data will be collected by Little Wandle
Severity of harm (regardless of likelihood)	Minimal	
Overall risk (taking into account measures to reduce risk above)	Low	

**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: 24/11/2021

**DPO Statement**

I confirm that I have reviewed the DPIA above and have made recommendations set out in the comments above which should be accounted for before implementing the above.

Signed: Judicium Education Ltd

Date: 24<sup>th</sup> November 2021

**Review**

This data protection impact assessment should be reviewed to ensure control measures are working and updated to reflect significant findings or changes.

<b>Date of next review:</b>	25 <sup>th</sup> November 2022
<b>Review to be carried out by:</b>	Bounds Green Primary School