DATA PROTECTION IMPACT ASSESSMENT

A Data Protection Impact Assessment (DPIA) is a process that helps an organisation identify and minimise the data protection risks of a project. **You should only complete this full DPIA where you have been told that one is required by the Information Rights Team or the Data Protection Officer.** If you have not been asked to do a full DPIA please do the pre-screen first. Search on essentials for 'DPIA' and download the DPIA pre-screen.

A DPIA is a legal requirement therefore please complete the form in as much detail as you can so the council has the necessary assurances of data protection legal compliance. Avoid technical language and jargon, and assume little prior knowledge of your subject and project by readers.

Ethics screening: If you have been advised to proceed straight to a full DPIA please complete the ethics screening at the end of this document. If you have already completed a DPIA pre-screen then the ethics screening need not be duplicated.

Project Name	E-Gov – Although this is not a project, it is an application/platform the Virtual School use for recording information for our Looked after Children, and with effect from June 2022, children on a Child Protection Plan	
Project Lead and Information Asset Owner/s	Project Lead	Natalie White
	IAO name and asset	Natalie White – Virtual School Head
Summary of the project. *Outline what your project is about. Start with a general headline and then go into more detail. Explain any acronyms on first use.*	The role of the Virtual School Head has been extended to promote the educational outcomes of children with a social worker. Non-statutory guidance (https://www.gov.uk/government/publications/virtual-school-head-role-extension-to-children-with-a-social-worker) from the Department for Education intends to support all local authorities as Virtual School Heads take a strategic leadership role in promoting the educational outcomes of the cohort of children with a social worker and those who have previously had a social worker who are aged from 0 up to 18. This guidance has been produced with input from the National Association of Virtual School Heads (NAVSH) and the Association of Directors of Children's Services (ADCS). The Government's Children in Need review recognised the crucial role that Virtual School Heads have in helping education settings and local authorities work together and made a commitment to explore the capacity needed to extend their leadership to the cohort of children and young people with a social worker. Coronavirus (COVID-19) has affected all children and for many of the most vulnerable has increased barriers to education. It is essential that the cohort of	

	children with a social worker are supported to recover from the pandemic. Camden Virtual School Head is to take on this additional role and will be participating in research to help the Department for Education understand how Virtual School Heads can be most effective in promoting educational outcomes. This cohort has been identified as a group of children who face significant barriers to education because of experiences of adversity and trauma, most commonly abuse and neglect. The Virtual School Head role for children with a social worker is a strategic leadership responsibility and will work with individual children and their families - including tracking and monitoring educational progress of individual children or providing academic or other interventions. The data will be collected by E-Gov who will request the education establishments to upload weekly data for attendance, exclusions, and punctuality onto an online portal, accessed by the Virtual School and the relevant social workers.
Implementation Date: *Should be at least a month to allow for assessment and any necessary steps to be undertaken*	N/A. We have been using this online platform since Sept 2018. A contract is currently in place for our Looked After Children however is due to be renewed in June to incorporate the collection of attendance data for Children in a Child Protection plan.

Initial risk assessment: Screening questions are to do an initial risk assessment and highlight problems that need to be addressed. Answering "Yes" to any of the screening questions above represents a potential privacy/data protection/security risk factor.

If you have already completed a pre-screen, attach it to the DPIA, skip q1 and go to q2 otherwise please answer the questions below.

Q 1	Step 1: Initial Risk Assessment	Yes/No
1.1	Does the project introduce new or additional information technologies that have privacy implications? (like facial recognition, AI?)	No
1.2	Will there be large scale systematic monitoring in a publicly accessible place – like a new CCTV system	No
1.3	Will you use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?	No
1.4	Does the project involve new identifiers, re-use or existing identifiers e.g. NHS or NI number, Mosaic ref, Northgate ref, and/or will use intrusive identification or identity management processes and/or electronic linkage of personal data?	Yes
1.5	Might the project cause data that was previously anonymous or pseudonymised (where a code is used instead of eg names) to become identifiable ?	No
1.6	Does the project involve multiple organisations, eg public sector agencies eg joined up government initiatives, or private sector e.g. outsourced service providers/ business partners?	No
1.7	Does the project involve new processing or significantly change the way in which personal data/special categories of personal data is handled?	No
1.8	Does the project involve new or significantly change handling of personal data/special categories of personal data about a large number of individuals?	No
1.9	Will data be combined, compared or matched from multiple sources?	Yes
1.10	Will you process biometric (finger print /facial recognition) or genetic data?	No
1.11	Will the personal data be processed out of the U.K? Eg any provers have out of UK servers?	No
1.12	Will children's personal data be processed for profiling or automated decision-making or for marketing purposes, or offering online services directly to them?	No
1.13	Does the project relate to data processing which is in any way exempt from legislative privacy protections?	No
1.14	Will personal data be processed in a way which involves tracking individuals' online or offline location or behaviour?	No
1.15	Will personal data be processed which could result in a risk of if there was a security breach?	Yes
1.16	Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation?	No

Step 2: What personal data is being used?										
2.1	**Is this use of personal data/special categories of personal data a new use? Or is it already happening and this is a change?**						New/Changed			
							New			
2.2	**What data will be processed/shared/viewed?**									
	Personal Data									
	Name	Yes	Date of Birth	Yes	Gender	Yes	National Insurance Number		Financial Information about the person	
	Address		Email address		Telephone number		NHS No		Other eg a reference number such as Mosaic ref	Mosaic
	Other data *(Please state):*		School attendance data							
	Special Categories of Personal Data									
	Racial or ethnic origin		Fingerprint Biometric		Religious or philosophical beliefs Political opinion					
	Trade Union membership		Physical or mental health or condition							
	Sexual life or sexual orientation		Housing records / Social services records		Tax, benefit or pension records		Employee/HR records			
	Other data *(Please state):*		N/A							
2.3	Will it include data about any criminal offence committed or alleged, or criminal offence record?		No							

Step 3: Describe the data processing		
3.1	**Describe in as much detail what is being done with the data - how is the data being used, how it is being handled, stored and transferred/shared?**	The data will be viewed by the Virtual School and relevant social workers. The attendance data of the child will be provided to the social worker and the Virtual School, who will offer support/interventions for low or dropping attendance. Mentors will be provided for support with low attendance and the Virtual School will be involved in systemic conversations with professionals, with the aim of improving educational outcomes for children on a Child Protection plan. The attendance data of children on a child protection plan/child in need plan, will also be shared with edcuation psychologists, who have been commissioned by the schools to work with these vulnerable children, to identiy barriers to education and improve their emotional wellbeing. This is not a new sharing process as the schools should already be sharing the data directly with the commissioned Education Psychologists, however this will be shared via a different route, from the Virtual School. The data is stored on the e-PEP application which is a secure platform. (A Data Protection Due Diligence Questionnaire has already been completed by EGOV in 2021) The Department for Education will ask the Camden Local Authority to share information about how their Virtual School Head has been supporting children with a social worker. The Virtual School Head will be invited to participate in research commissioned by the Department for Education to help develop a strong evidence base for how they can effectively promote the educational outcomes of children with social workers.

3.2	**Explain in as much detail as possible why this is being done**	For many children with a social worker, the pandemic will have increased some of the existing barriers that they faced in education across attendance, learning, behaviour and mental health and wellbeing. Children with a social worker are around 3 times more likely to be persistently absent from school and between 2 to 4 times more likely to be permanently excluded from school than their peers. This group are also over ten times more likely to attend state funded alternative provision. The Children in Need review found that Virtual School Heads, who can bridge the gap between and support education settings and local authorities, could present opportunities to promote the educational needs of children with a social worker. Virtual School Heads are already raising aspirations and promoting the educational achievement of looked-after children and the cohort of previously looked-after children, through local authority duties which are set out in the Children Act 1989 and the Children and Families Act 2014. Unlike looked-after children, or previously looked after children, the cohort of children with a social worker who are subject to Child in Need plans or Child Protection plans have not had the benefit of a strategic leader that is able to champion the educational needs of their cohort and help them make educational progress. As the strategic leader for children with a social worker, Virtual School Heads will bring greater awareness to the disadvantage that this cohort of children can experience, promote engagement in education and help to narrow the attainment gap. Virtual School Heads will advocate for and model a strengths-based approach to supporting children and promoting their educational outcomes.

<table>
<tr><td></td><td colspan="2"></td><td></td></tr>
<tr><td rowspan="3">3.3</td><td colspan="2">Are you sharing the data with an external organisation or partner or are they involved in processing the data?</td><td>e-GOV</td></tr>
<tr><td>External organisation or partner
Name</td><td>Controller or Processor?</td><td>Is there an existing contract or Data Sharing Agreement between the council and the parties which covers information security and data protection ? Yes/No/In progress</td></tr>
<tr><td>e-GOV</td><td>Processor</td><td>Contract</td></tr>
<tr><td>3.4.</td><td colspan="2">Has a data flow mapping exercise been undertaken? If yes, please provide a copy, if no, please undertake</td><td>No, not required</td></tr>
<tr><td>3.5</td><td colspan="2">How will the information be processed/shared. Details eg secure file transfer</td><td>The Designated Teachers will have access to e-GOV (Single Sign-on (epeponline.co.uk) the online portal provided by the supplier. They will be able to view the children’s details for their school only, and only the children who are currently on a child protection plan. They will input the attendance data onto the system on a weekly basis. This is a secure platform accesses by the school and Camden LA (Virtual School), The allocated social worker for each child and the Virtual School administration staff will also have access to this information</td></tr>
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<table>
<tr><th colspan="4">Step 4: Assess lawful basis, necessity, and proportionality</th></tr>
<tr><td>4.1</td><td colspan="3">Identify Lawful Basis for processing personal data/special category /criminal data. Ask IRT for advice if needed (DPA@camden.gov.uk if you have no named Information Rights Officer advising)
If not processing the category say N/A</td></tr>
<tr><td></td><td>Personal data Article 6(1) UK GDPR condition

Article 6(1)(e) public task with underlying law being Children Act 1989, Children and Families Act 2014 and the Localism Act 2011</td><td>Special Category data UK GDPR Art 9 condition and DPA18 schedule condition

Not required</td><td>Criminal data UK GDPR Art 10 condition and corresponding art 6 condition

Not required</td></tr>
<tr><td>4.2</td><td colspan="3">If consent is a legal basis how is it obtained? Note that in most cases consent is not the basis relied on by the council. Only use consent when Information Rights Team have advised this is appropriate</td></tr>
<tr><td></td><td colspan="3">N/A</td></tr>
<tr><td>4.3</td><td colspan="3">How will you ensure data quality and data minimisation- how will you ensure the data is accurate and you are only using the minimum data to achieve your aims? If this is covered in a pre-screen refer to the pre-screen, otherwise detail below</td></tr>
<tr><td></td><td colspan="3">The Virtual School will identify the minimum amount of personal data required to fulfil our purpose and will relate to only those children who are currently on a Child Protection Plan. The data will be used to make informed decisions, therefore nay data which is identified as possibly being inaccurate will be checked the with relevant education establishments. The attendance data collected will be analysed and the only data identified to be low in attendance will be used to share with relevant internal professionals to promote the engagement of children in education and narrow the attainment gap.</td></tr>
<tr><td>4.4</td><td colspan="2">Have individuals been informed about the proposed use of their data? For example, do all the organisations/partners who will process the data (inc the council) cover this use in their Processing Notice online</td><td>Yes – The Virtual School will inform all schools via the Head's bulletin and the allocated Social Workers, via email. Parents will be informed via the provacy notice for schools.</td></tr>
</table>

4.5	**Will you comply with the council's policies on to Subject Access Requests and other data subject rights? Do contracts with any processors for the council contain the council's clauses on data subject rights?**
	Yes
4.6	**Will the processing of data include automated individual decision-making, including profiling?** If yes, please outline the profiling processes and the rights of the data subject
	No
4.7	**Data Retention Period - how long will the data be kept?**
	As long as the child is on a Child Protection Plan. The turnover of children on a Child Protection plan is relatively high. As soon as a child is removed from the Child Protection Plan on Mosaic, the child's profile on e-GOV will be archived and the data will no longer be available for viewing.
	Step 5: Information Security Process
5.1	**On what systems will the data will be stored** *Examples of Storage include bespoke system (e.g. EPR, Emis & other clinical systems, SharePoint, data repository, Network Drives, Filing cabinet (office and location), storage area/filing room (and location) etc.*
	e-PEP and the shared drive where only the Virtual School have access
5.2	**Where is the data stored geographically?**
	The UK: Gloucestershire & Central London
5.3	**What roles will have access to the information?** (List individuals or staff groups)
	The Virtual School Staff, and social workers allocated to the children
5.4	Is there role-based access control on all applicable systems? **How will access to information be controlled?**

	Yes. By the 3-administration staff within the Virtual School, the Virtual SChool Head and the Specalist Reintegration Inclusion Officer who have full access to all children's profiles. Each time a child is placed on a protection plan, the member of Virtual School admin staff will add the details to e-GOV and only the allocated social worker to the child will have access.
5.5	**Is there an ability to audit access to the information?**
	Yes, there is an audit trail on the e-Gov platform each time a user logs onto the child's profile and makes any changes. Only the Virtual School administration staff and e-GOV can view this
5.6	**What security and audit measures have been implemented to secure access to and limit use of personal data/special categories data and/or criminal data?**
	The data will only be shared with the Social Worker who is allocated to young person on the child protection plan and will not be shared with any external agencies therefore the information is secure and will be held within the local authority. An audit trail is available on the e-GOV platform and the only person who will have access to the data on the platform is the allocated Social Worker and the administration staff from the Virtual School
5.7	**Has the Information Security Manager advised on the security measures? What were his/her comments?**
	Yes – to undertake a full DPIA

Step 6: Identify and Assess Risks			
Describe source of privacy (data protection, privacy and information security) risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	**Likelihood of harm- see table 1**	**Severity of harm- see table 2**	**Overall risk – see table 3**
If the data is lost or misplaced/mis-stored when transferring from the education setting to the local authority, via the E- Gov platform.	Unlikely	Minor	Moderate
The potential privacy impact on the child and family If the data has been input incorrectly on a child's profile by the school. The social worker may contact the incorrect family to discuss low attendance	Unlikely	Minor	Moderate
Wider sharing increases the risk of disclosure to inappropriate persons	Unlikely	Moderate	Moderate
Inappropriate secondary processing by recipients of the data/ If the data users are accessing the information inappropriately or unauthorised purposes	Unlikely	Moderate	Moderate
Data kept for longer than retention periods	Unlikely	Minor	Moderate

Step 7: Identify Measures to reduce risk

Identify measures to reduce or eliminate risks identified in step 6. *Remember that risks need to be reduced to an acceptable level, and not all risks can be eliminated.*

Then calculate the risk that remains after the mitigations/controls are in place: the residual risk. Tables 1, 2 and 3 will help with this. *Note that risks and scores are subject to review and change by IRT/DPO*

The Information Asset Owner/s need to decide if the mitigations are achievable and if the residual risk is accepted in the 'measure approved?' column by inserting a Yes or No. Table 4 provides guidance on what level of residual risk could be acceptable.

Risk identified in step 6	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
If the data is lost or misplaced/mis-stored when transferring from the education setting to the local authority	The review client software is designed with a number of features to reduce the probability of human errors in the recording of the E-GOV platform, including back up, scheduled patch management (software & firmware), business continuity, disaster recovery. Council data will be transferred using an agreed, secure, electronic transfer facility which adheres to Government requirements and assurance. E-Gov's hosting is entirely in the UK, EU based and certified compliant with ISO/IEC 27001 by an accredited body. E-Gov are GDPR - hosting on secure premises and uses logical separation of data for each client	Reduced	Minor	yes
Human error – client data processed by the provider is inaccurate, leading to Data Breach - The potential impact on the child and family If the data has been input incorrectly on a child's profile by the school. The social worker may contact the family to discuss incorrect attendance data	The only personally identifiable piece of data shared will be education attendance data for the recent week that has just passed. The only possible data breach will contain incorrect education attendance data, provided to the parents/carers of the young person. Client data will be verified with the education setting	Reduced	Minor	yes

Wider sharing increases risk of disclosure to inappropriate persons	Training and appropriate policy. Data minimisation, sharing only what is needed. Knowledge of DSA/ISA and its limits.	Reduced	Minor	yes
Inappropriate secondary processing by recipients of the data/ If the data users are accessing the information inappropriately or unauthorised purposes	E-Gov has appropriate policies in place, staff are trained, aware of the limits of secondary processing and the need for all processing to be compliant with Data Protection legislation. All council and contracted employees with access to this data are bound by the council's employment terms and misusing information would be a disciplinary offence and may be a criminal office.	Reduced	Minor	yes
Data kept for longer than retention periods	The contract will have clear clauses in about retention periods and data deletion. Breach would be a contractual and DP breach. All partners have a destruction of records policy in place. Information must not be retained for longer than necessary for the purpose for which it Low Yes was obtained. Disposal or deletion of personal data once it is no longer required, must be done securely with appropriate safeguards, in accordance with that organisation's disposal policies.	Reduced	Negligible	yes
Residual (remaining) risk level when all mitigations have been applied: *Note IRT/DPO may change this*				
Low				

Step 8: Record Data Protection Officer advice and outcome	
DPO involved in preparing DPIA? **If not, name of IRO**	No, Sarah Laws, Data Protection Manager
DPO advice	Approved, Andrew Maughan, DPO, May 2022
Information Asset Owner acceptance of residual risks	Names of IAOs – Natalie White
This DPIA will kept under review by: (*usually the author or the IAO)*	[redacted]

Version Control

Version	Reason	Date	Author(s)
1.0	New DPIA	May 2022	[redacted] and Sarah Laws
2.0	Updated	June 2022	[redacted] and Sarah Laws

Appendix 2: Ethics screen.

Only complete this if you have skipped the DPIA pre-screen and proceeded straight to a full DPIA. If you did the ethics screen as part of the DPIA pre-screen ignore this section.

Ethical Assessment. In assessing ethics you need to take into account the benefits, proportionate use, possible biases and transparency of the impact of the proposed processing and analysis of personal data on individuals and groups. It is the responsibility of the Project Manager and Sponsor to assess the potential ethical impacts that the intended processing may pose. (These answers can be reused for questions dealing with the same issues in the Full DPIA if the outcome of this pre-screen requires you to do one) This will be a link to Camden's Data Charter but this does not exist yet

1. Effects on Residents

a) How does use of this data benefit our residents? (Is there evidence of this approach being likely to meet a public need?)

- All children on a Child Protection plan will have their attendance and exclusion data recorded, to enable the Virtual School to monitor persistent absence and low attendance trends, with a view to providing the right intervention to improve educational outcomes

b) What would be the harm in not processing this data?

- The Children in Need review found that Virtual School Heads, who can bridge the gap between and support education settings and local authorities, could present opportunities to promote the educational needs of children with a social worker. Virtual School Heads are already raising aspirations and promoting the educational achievement of looked-after children and the cohort of previously looked-after children, through local authority duties which are set out in the Children Act 1989 and the Children and Families Act 2014. Unlike looked-after children, or previously looked after children, the cohort of children with a social worker who are subject to Child in Need plans or Child Protection plans have not had the benefit of a strategic leader that is able to champion the educational needs of their cohort and help them make educational progress. By not recording this data and passing it to the allocated Social Worker, low attendance and persistent absence may not be picked up as quickly.

2. Data Bias

a) How do you plan to identify errors and biases in data collection, analysis and algorithms?

- If any errors are detected in the data received from the schools, the Virtual School would contact the school attendance officer to clarify the data provided to confirm the correct figure, and rectify any errors found. By analysing the weekly data provided by the school, any anomalies should be detected quickly.

b) Once errors and biases have been identified in data collections, how will they be taken into account for any future policy or service which uses this work as an evidence base?

- The data would be corrected quickly on the e-PEP platform, and the school would be contacted to clarify the data provided.

c) Who could be negatively affected by processing this data? (How can you show there is a **fair balance** between the **rights of individuals** and the **interests of the community**?

- There is no potential for a negative impact as the intention is to use this data to monitor school attendance for a child on a Child Protection plan, with a view to improving their educational outcomes and provide the appropriate advice, guidance and support to the schools and other related professionals

3. Limitations of Data

a) How will you make sure that you only process the data that is necessary and proportionate for the purpose of the project, and no more than is necessary?

- The Virtual School are only collecting attendance data, exclusions, and punctuality for children on a Child Protection Plan. No other data is required. Children on a Child Protection plan have a high turnover, therefore as soon as a child's case is closed, their profile will be archived on the e-PEP system, therefore no longer required for use.

*b) How are you ensuring the data used is reliable? (**Data quality**)*

*i) What processes do you have in place to ensure maintenance of data accuracy? (**Data integrity**)*

- The data is reliable as it is the same data that is supplied to the Department of Education for reporting purposes, and is provided by the school attendance officer

*ii) How have you clearly marked origins and destinations of data used to trace source of errors? (**Data lineage**) (Are all metadata and field names clearly understood)*

- The mosaic number is used on the e-PEP system however is recorded as the client ID. All staff using the e-PEP system are fully aware this relates to mosaic. This is the main identifier used to correlate the child's name and allocated Social Worker against mosaic.

d) *How could the objectives of this project be completed without processing the data?*

- The objectives would not be able completed, as without collecting attendance data for these vulnerable children, the Virtual School would not be able to fulfil their role in providing early intervention for a child whose attendance is dropping at school. This is turn would have a negative effect in being able to support these children to achieve their full potential in their education.