

Data Protection Impact Assessment

DPIA Name: **Virtual School Personalised One to One Tuition for Children Looked After and Children with Complex Needs (SEND)**

Ref No: **88041**

Stage 1: Data Protection Impact Assessment screening questions for proposed changes. Please read the DPIA guidance document before completing this form

	Screening questions	Yes	No
1	Will the project involve the processing of information about individuals? Please note this does include pseudonymised data*	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Will information about individuals be disclosed or shared with organisations or people who have not previously had routine access to the information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Does any phase of the project utilise automated decision making based on the information provided/ shared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Will the project require you to contact individuals in ways which they may find intrusive? e.g marketing*	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer is “yes” to any of the questions above then a DPIA must be carried out.

Please ensure that this has been to the following :

Information Management & Governance, Subject matter experts including Business Partners, ICT, CYBER.

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Stage 2: Data Protection Impact Assessment

Version control

Version	Status	Revision Date	Summary of Changes	Author
1	Final	10/07/2024		Howard Smith

DPIA Approved by Information Asset Owner	Name:	Date:
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Section A: New/Change of System/Project General Details

Name: (of the project or change to be delivered)	Virtual School Personalised One to One Tuition for Children Looked After and Children with Complex Needs (SEND)
Background/ Objectives: (why is the new system / change required?)	This is the re-procurement of One to One Tuition for Children Looked After and Children with Complex Needs (SEND)
Information flow diagram* (please see examples in guidance) see section 3	<p>Designated Teacher completes referral through Connex's online portal</p> <p>↓</p> <p>Provider accepts referral or passes to the LCC Virtual School service for approval</p> <p>↓</p> <p>Provider makes contact with the child's carer and delivers a 12 week programme of tuition</p> <p>↓</p> <p>Provider completes summary of progress and impact and sends to Designated Teacher through portal</p> <p>↓</p> <p>Designated Teacher completes the progress and impact section on the portal and alerts the Virtual School</p> <p>↓</p> <p>All performance monitoring and invoice information passed to the Contract Manager is anonymised.</p>

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State who is the Data Controller*	Leeds City Council, Connex Education Partnership, Schools	
Benefits: (explain what the project aims to achieve, what benefits to the organisation, to individuals and to other parties)	The service will support attainment at school for young people who have often faced disruption in their learning. It is also available to gifted students who will benefit from advanced learning in their chosen subject.	
Consultation: (If required detail here any consultation undertaken with the public, partners, internal or external stakeholders)	Consultation has been carried out with Virtual School colleagues, SENSAP, designated teachers, young people and carers during the course of the current contract.	
Implementation date: for example the timescales required for completion, implementation date	1 st September 2024	
Relationships / Partnerships: (e.g. with NHS, or private organisation, stakeholders, please also if possible state whether they are designated as data controllers or data processors)	<p>The procurement was limited to the Framework for the Supply of Temporary Teachers, all eligible bidders on the framework are private companies.</p> <p>Each school in the city has a Designated Teacher who has responsibility for the education of young people in local authority care.</p> <p>The provider will be joint data controller with the school and Virtual School.</p> <p>Connex own their own in-house developed CRM system that stores the information and can be accessed by the virtual school and designated teachers. The system is used for a number of contracts with local authorities, is secure and has levels of login which only show information that individual is entitled to.</p>	
Project Manager:	Name:	Howard Smith
	Job Title:	Commissioning Manager
	Service:	Children and Families Commissioning and Market Management Team
	Telephone:	3785419
	Email:	howard.w.smith@leeds.gov.uk
Information Asset Owner(s) All information assets must have an information asset owner (IAO). IAO are usually Heads of Service or Chief Officers.	Name:	Jancis Andrew
	Job Title:	Head of Virtual School
	Service:	Virtual School
	Telephone:	37 81469
	Email:	Jancis.andrew@leeds.gov.uk

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System Administrator (if applicable)	Name:	N/A
	Job Title:	
	Service:	
	Telephone:	
	Email:	

Section B: Data Protection Impact Assessment (please complete all questions as fully as possible)

	Question	Response	Guidance document
Processing			
1	Please state the purpose for the processing of the data / information: (for example, service provision, research, audit, employee administration)	Service provision	
2	Please tick the data items/ information that will be processed	<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Address/Postcode <input checked="" type="checkbox"/> Date of Birth <input checked="" type="checkbox"/> Telephone no/email <input checked="" type="checkbox"/> Next of Kin <input checked="" type="checkbox"/> National Insurance Number <input type="checkbox"/> NHS Number <input checked="" type="checkbox"/> Gender <input type="checkbox"/> GP / Consultant <input type="checkbox"/> Pseudonymised	
2b	Special categories and Criminal data	<input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Political opinions/trade union membership <input type="checkbox"/> Religion <input type="checkbox"/> Physical health <input checked="" type="checkbox"/> Mental health (only if telling the tutor about mental health needs is required for the benefit of the young person) <input type="checkbox"/> Medical history <input checked="" type="checkbox"/> Ethnic Origin	

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		<input type="checkbox"/> Sexual life <input type="checkbox"/> Criminal convictions	
2c	Other (please specify)	School attainment	
3a	What is the legal basis you are relying on for the processing of the data/information. (please see guidance section 4 for all of question 3)	Public Task	
3b	If you are relying only on consent, did you consider any other legal basis?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	
3c	If using consent, how will that consent be obtained and recorded and withdrawn if requested? (please state)	N/A	
4	Will personal data items be collected which have not been collected before?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5	The data of approximately how many individuals will be affected?	<input type="checkbox"/> 1-10 <input type="checkbox"/> 10-100 <input checked="" type="checkbox"/> 100-1000 <input type="checkbox"/> 1000-10,000 <input type="checkbox"/> 10,000+	
6	How is the personal data obtained?	<input type="checkbox"/> From Client/Service User <input type="checkbox"/> From partner agencies <input checked="" type="checkbox"/> From 3 rd Party/ Another Individuals <input type="checkbox"/> For employment purposes <input type="checkbox"/> Internal services <input type="checkbox"/> Other	

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		From the Designated Teacher, they get the consent from the young person and their carer	
7	Have the individuals been informed of this processing?	<input checked="" type="checkbox"/> Yes (explicit) <input type="checkbox"/> Yes (implicit i.e. through Privacy notice, website, leaflet etc) <input type="checkbox"/> No	If no please record as risk in section C
8	Does the information involve new linkage / matching of personal data with data in other collections, or is there significant changes in data linkages / matching?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The data will be recorded on the child's school record	If yes please record as a risk in section C
9	Does this project involve utilising data for the purposes of automated decision making/profiling. If so add details (please see guidance section 4)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Please see guidance
Records Management			
10	Does this project create a new Information Asset?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10a	How will the information be kept up to date and checked for accuracy and completeness?	The school and tutor will notify each other if any changes to the child's personal details or educational needs are made during the programme of tuition	If there are no documented procedures to evidence this answer, please record as a risk in section c
10b	What processes are in place for data quality checking?	A sample of tuition records on the Connex CRM system will be checked by the virtual school at least once a month to ensure data is correct. They also review all completed records at the end of the tuition programme so patterns of inconsistencies will be picked up through contract management and quality assurance checks.	

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11	If this project involves a new system, does it have the ability to quarantine information/restrict processing? (See guidance for details)	Yes	Please see guidance
11a	Does the system have the ability to amend or add notes to data/information at a single data field level?	Yes	Please see guidance
12	What checks have been made regarding the adequacy, relevance and necessity for the collection of data?	See question 10	If no checks have been made please record this as a risk in section C
13	Where will the information be stored / accessed? (please see guidance section 4 for further information about cloud storage)	<input checked="" type="checkbox"/> LCC System/ Application <input type="checkbox"/> Sharepoint <input type="checkbox"/> LCC email system <input type="checkbox"/> Paper filing system <input type="checkbox"/> LCC File-Shares (e.g Network Drives) <input type="checkbox"/> Removable media <input type="checkbox"/> External to LCC (cloud, web hosted) <input checked="" type="checkbox"/> other Provider's own system and school sytem	
14	What are the retention periods?	Standard T&C – 12 years	If there are no documented retention periods please record as a risk in section C
15	How will the information be destroyed when it is no longer required?	Certified destruction	
15a	If held electronically, can the destruction be certified?	Yes – requirement of contract	
15b	Can the information be deleted at a singular data field level?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please see guidance

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Security			
16	Who will access the information? (i.e. Services, roles, organisations)	Virtual School, Designated Teacher	
17	Is there an Access Control Policy in place? (Please see guidance section 6 for further information)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
18	Is there an ability to audit access to the information? (Please see guidance section 6 for further information)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C .
19	Detail what security measures have been implemented to secure access and limit the use of personal information?	Secure email transfer Limited access to Connexr CRM system files Connex Education Partnership have had the system checked by an independent security firm.	
20	Does this project involve privacy invasive technologies? (Please see the guidance)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please detail	
21	Is there a business continuity and a disaster recovery plan in place?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C
22	Where external parties are accessing LCC information has it been identified that they require IG training?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No All providers on the framework regularly process personal information on behalf of schools, no training required.	
Sharing			

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23	Will any of the information be shared with other organisations or LCC services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes please record as a risk in section C
23a	Please list all organisations/LCC services involved with sharing	Provider, Virtual School, Designated Teacher at the child's school	
23b	What is the legal basis for sharing?	Public Task	Please note that your legal basis for processing may be different from your legal basis for Sharing. Please refer to guidance
24	Will there be signed information sharing agreements in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If no please record as a risk in section C
25	Which method will be used to transport information if it is going off site?	<input checked="" type="checkbox"/> Standard email <input checked="" type="checkbox"/> Secure email (e.g. GCSx) <input type="checkbox"/> Website <input type="checkbox"/> Via courier <input type="checkbox"/> By hand <input type="checkbox"/> Via external post <input type="checkbox"/> Via telephone <input type="checkbox"/> Removable Media <input type="checkbox"/> Secure file transfer protocol (eg. mail express) <input type="checkbox"/> Other file transferring applications (dropbox) <input type="checkbox"/> Social Media <input type="checkbox"/> Providing access via LCC systems <input type="checkbox"/> Other (please give details)	If no please record as a risk in section C
26	Are you transferring any personal identifiable data/information to a country outside the United Kingdom	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes please record as a risk in section C

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Section C: Identify the Information, Privacy and related risks

Identify the key risks. All risks identified from the questionnaire in section B should be included, plus any others of relevance. Describe the actions you could take to reduce the risks and any future steps which would be necessary (e.g. the production of new procedures or future security elements for systems).

Please note if your project has a large number of risks there is an alternative spreadsheet you can use, (please ask your IG officer) or simply continue onto a separate sheet.

Risk	Solution	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution justified, compliant and proportionate response to the aims of the project?
Security of data from the provider to the tutor	Ensure the provider has a secure data transfer system and the tutor stores files on a secure online platform.	Reduced	Connex have explained their in-house CRM system and how it has been checked for security
Too much personal information is shared by the Designated Teacher to the tutor	Only relevant personal information that will directly impact the tutor's approach to teaching will be shared. Checks will be made during contract management to ensure that data protection and information sharing protocols are being adhered to. The Virtual School will report any excessive personal data shared to the head teacher of the child's school.	Reduced	Contract management

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