

Gladesmore Community School

Data Protection Impact Assessment (DPIA) [OP8.3] Updated March 2024

NOTE : Before conducting the DPIA, the following questions should be considered:

1. Has consultation taken place with internal stakeholders with regard to risks arising from the proposed processing operation?
2. Has consultation taken place with stakeholders on the risks of non-compliance with the GDPR?
3. Have the Governors been informed on the proposed data processing?
4. Has any consultation with external stakeholders taken place? If yes, who, when and for what purpose?
5. In addition to identifying risks, have the consultations involved consideration of measures for avoiding or minimising the risks?

Description of Service / Data protection issue	Type of Data	Reason to hold the data	Where is the data stored?	Assessment of Risks Risks to data / Data subjects	Proposed/current Mitigation measures	Decision
School Census data	Pupil personal details: <ul style="list-style-type: none"> • Name • DOB • Address • Gender • UPN • Parental contact • Free School Meals eligibility • Ethnicity • Nationality • Proficiency in English • In Care details • SEN 	Statutory duty – Education Act (Statutory)	Online School network	Lost passwords/Unauthorised Access Lost paper/hard copy printouts Unauthorised access to files on the network	Complex password with regular prompts to change. Printouts of only summary sheet rather than individual records. Stored in locked filing cabinet. Files are encrypted and password protected.	Risk sufficiently mitigated Risk sufficiently mitigated Risk sufficiently mitigated
Management Information system (Capita SIMS)	Pupil personal details: <ul style="list-style-type: none"> • Name • DOB • Address • Gender • UPN • School registration 	Keeping Children Safe in Education Act (Statutory) Children Act 2004	School network (SIMS)	Lost passwords/Unauthorised Access Unauthorised access to	Requires the SIMS software installed to see data, meaning access is only within the school. Backups are stored on	Risk sufficiently mitigated Risk sufficiently

Gladesmore Community School

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	<ul style="list-style-type: none"> • details • Contact details such as mobile and email • Parental contact • Free School Meals eligibility • Ethnicity and Religion including languages spoken • Nationality • Proficiency in English • In Care details • School History • SEN • Photo 			database backup	tapes which are held in a fireproof safe. Only the network manager and premises manager has access to the safe.	mitigated
Pupil Admission forms	<p>Pupil personal details:</p> <ul style="list-style-type: none"> • Name • DOB • Address • Gender • UPN • School registration details • Contact details such as mobile and email • Parental contact • Free School Meals eligibility • Ethnicity and Religion including languages spoken • Nationality 	Verify pupil admission details	Stored on paper	Lost or misplaced paperwork	Locked filing cabinet. Transferred to overhead locked storage after pupil leaves school.	Risk not necessarily mitigated but accepted
Parental communication – Phone and Text	<p>Parent personal details:</p> <ul style="list-style-type: none"> • Name • Gender 	Parental contact and correspondence	School network (SIMS)	Lost passwords/Unauthorised Access	Requires the SIMS software installed to see data, meaning access is only within the school.	Risk sufficiently mitigated

Gladesmore Community School

Data Protection Impact Assessment (DPIA) [OP8.3] Updated March 2024

	<ul style="list-style-type: none"> Relationship to pupil Email address Contact number 					
School Workforce Census data	<p>Staff personal details:</p> <ul style="list-style-type: none"> Name DOB Address Gender National Insurance Number Qualifications Teacher Number Employee/Payroll Number Contract/Scale Range 	School Workforce Census and school administration	School network (SIMS)	Lost passwords/Unauthorised Access	Requires the SIMS software installed to see data, meaning access is only within the school. Only specific accounts can see the data.	Risk sufficiently mitigated
Staff personnel file	<p>Staff personal details:</p> <ul style="list-style-type: none"> Name DOB Address National Insurance Number Contact number Email address Vehicle Registration number 	Staff personnel file	School network (SIMS)	<p>Lost passwords/Unauthorised Access</p> <p>Lost or misplaced paperwork</p>	<p>Requires the SIMS software installed to see data, meaning access is only within the school. Only specific accounts can see the data.</p> <p>Locked and secure room. Accessible only by one member of staff.</p>	<p>Risk sufficiently mitigated</p> <p>Risk not necessarily mitigated but accepted</p>
Supplier financial details	<p>Supplier company details:</p> <ul style="list-style-type: none"> Name Address Contact name Contact number 	Financial keeping and purchase ordering	School network (FMS)	Lost passwords/Unauthorised Access	Requires the FMS software installed to see data, meaning access is only within the school. Only specific accounts can see the data.	Risk sufficiently mitigated

Gladesmore Community School

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	<ul style="list-style-type: none"> Email address VAT number Bank account number Bank sort code 					
Financial invoices	<p>Supplier company details:</p> <ul style="list-style-type: none"> Name Address Contact name Contact number Email address VAT number Bank account number Bank sort code 	Payment of invoice	Stored on paper	Lost or misplaced paperwork	Locked filing cabinet. Transferred to overhead locked storage after pupil leaves school.	Risk not necessarily mitigated but accepted
Safeguarding records	<p>Pupil personal details:</p> <ul style="list-style-type: none"> Name DOB Address Gender Contact details such as mobile and email Parental contact Ethnicity In care/child protection details 	Children Act 2004	Stored on paper	Lost or misplaced paperwork	Stored in locked filing cabinet.	Risk not necessarily mitigated but accepted
London Grid for Learning/Atomwide export	<p>Pupil personal details:</p> <ul style="list-style-type: none"> Name DOB Gender UPN Registration group 	Computer network user provisioning	Online – data transfer from school server	Compromised data extraction tool	Installation carried out only by school network manager	Risk not necessarily mitigated but accepted

Gladesmore Community School

Data Protection Impact Assessment (DPIA) [OP8.3] Updated March 2024

	<ul style="list-style-type: none"> • LGfL email address 					
ShowMyHomework export	Pupil personal details: <ul style="list-style-type: none"> • Name • DOB • Gender • UPN • Registration group 	ShowMyHomework user provisioning	Online – data transfer from school server	Compromised data extraction tool	Installation carried out only by school network manager	Risk not necessarily mitigated but accepted
MyStickers Wonde export	Pupil personal details: <ul style="list-style-type: none"> • Name • DOB • Gender • UPN • Registration group 	MyStickers user provisioning	Online – data transfer from school server	Compromised data extraction tool	Installation carried out only by school network manager	Risk not necessarily mitigated but accepted
EduKey export	Pupil personal details: <ul style="list-style-type: none"> • Name • DOB • Gender • UPN • Registration group • SEN information 	SEN provisioning and planning	Online – data transfer from school server	Compromised data extraction tool	Installation carried out only by school network manager	Risk not necessarily mitigated but accepted
School recruitment	Candidate personal details: <ul style="list-style-type: none"> • Name • Address • Contact number and email • Education history • Employment history • Qualifications 	Part of the application process	Stored on paper	Lost or misplaced paperwork	Stored in a locked room.	Risk not necessarily mitigated but accepted