

## Data Protection Impact Assessment (New Wonde)

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Old Park School operates a cloud-based system. As such Old Park School must consider the privacy implications of such a system. The Data Protection Impact Assessment is a systematic process for identifying and addressing privacy issues and considers the future consequences for privacy of a current or proposed action.

Old Park School recognises that moving to a cloud service provider has a number of implications. Old Park School recognises the need to have a good overview of its data information flow.

The Data Protection Impact Assessment looks at the wider context of privacy taking into account Data Protection Law and the Human Rights Act. It considers the need for a cloud-based system and the impact it may have on individual privacy.

The school needs to know where the data is stored, how it can be transferred and what access possibilities the school has to its data. The location of the cloud is important to determine applicable law. The school will need to satisfy its responsibilities in determining whether the security measures the cloud provider has taken are sufficient, and that the rights of the data subject under the UK GDPR is satisfied by the school.

Old Park School aims to undertake this Data Protection Impact Assessment on an annual basis.

A Data Protection Impact Assessment will typically consist of the following key steps:

1. Identify the need for a DPIA.
2. Describe the information flow.
3. Identify data protection and related risks.
4. Identify data protection solutions to reduce or eliminate the risks.
5. Sign off the outcomes of the DPIA.

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## Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

**What is the aim of the project?** – To help deliver a cost-effective solution to meet the needs of the business.

Wonde enables accessibility to personal data from the school's Management Information System to deliver a variety of apps and services on behalf of the school. As such Wonde ensures information security and enables the school to manage what access is given to personal data hosted on the school's Management Information System. As the data controller it is important that [Old Park School](#) controls exactly what data is shared with each application.

Wonde is a provider of online platforms and Application Program Interfaces (API)\* which are simple, smart, and secure and gives schools more control and visibility of their own data and provides additional tools.

\*An Application Program Interface (**API**) is a set of routines, protocols, and tools for building software applications. An **API** specifies how software components should interact.

### Wonde and Third Party Apps/Vendors

Wonde's core service is used by a large percentage of schools in the UK to control the Management Information System (MIS) data it shares with third party vendors used at the school. These vendors include solutions for assessment, maths, English, library management, parent communications, parent payments, Multi Academy Trusts, voucher systems, Google/Microsoft syncing, classroom content providers etc.

Wonde is ISO27001 accredited and the majority of schools use Wonde to manage their MIS data sharing and syncing with multiple third party vendors.

When a vendor (app), or vendors, requests to be connected to a school via Wonde - if the school approves that vendor(s) request and for Wonde to facilitate it, then Wonde will complete a base integration with the schools' MIS.

Wonde request (but do not extract) the permissions that are required for the majority of vendors that use its services. Wonde will then only extract and send data that has been approved by a school to send onwards to their chosen vendors. For clarity, Wonde does not extract data that is not approved by the schools for the vendors they are using.

For example, both FSM (the Free School Meals voucher application provided by Wonde) and Teachers2Parents (from EduSpot, the owners of SchoolMoney) use the 'contacts' data scope, which has the parent responsibility tags within it. SchoolMoney only use the PR1 data, whereby the FSM app serves contact details based on the prioritisation described here. This is to allow the school to select the most appropriate contact for the voucher to be sent to, based on the factors given in that link.

The above example clarifies how the two levels of permissions work regarding Wonde's install with the schools' MIS, and how that then relates to serving the data the school have approved to be sent to the vendors (apps) the school work with.

### **DfE and automated collection of attendance data using Wonde**

Wonde enables accessibility to personal data from the school's Management Information System to deliver a variety of apps and services on behalf of the school. As such Wonde ensures information security and enables the school to manage what access is given to personal data hosted on the school's Management Information System.

The Department for Education (DfE) have been looking at how it can establish a timely flow of pupil level attendance data across schools, Local Authorities (LAs), Multi Academy Trusts (MATs) and DfE, through automation, without placing any additional administrative burdens on schools.

With this in mind, schools may have been contacted by Wonde where schools are currently sharing attendance data with the DfE. This is because the DfE are updating some of the data fields to meet the DfE's new statutory requirement regarding the submission of school attendance data, effective from 18 August 2024.

The DfE have specified the following data will be collected for their 'View Your Education data Platform', which is part of their 'Daily Pupil Attendance Data Project'.

- Students child in need read (Child in need) - where this is available in the MIS
- Students child protection plan read (Child protection plan) - where this is available in the MIS
- Students admission date read (Pupil start date)

- Students leaving date read (The date a pupil is expected to leave school)
- Students leaver leaving date read (The actual leaving date of the pupil)
- SEN rank content
- SEN type code content
- Special education needs
- Students address
- Students contact details
- Students first language
- Student leaver first language
- Students leaver legal forename, middle names, and surname
- Students leaver contact details
- and Students leaver address.

With reference to the school's privacy notice (pupil) under **The categories of pupil information that we collect, hold and share include** it mentions Attendance information (such as sessions attended, number of absences and absence reasons, any previous schools attended).

Additionally, under **Who do we share pupil information with?** the privacy notice (pupil) states that the school routinely share pupil information with: the Department for Education (DfE).

On this basis the school would have a lawful basis to share attendance data and would not need consent from parents/guardians. Wonde state that the DfE are updating some of the data fields that the school share with them.

Sharing this data will mean the school are sharing all required fields to meet the DfE's new statutory requirement regarding submission of school attendance data, effective from 18 August 2024.

To agree schools will need to click 'yes' to give their agreement when asked through a secure portal. It is a one-off process, once a school agrees to share data it will be automatically extracted from the Management Information System and sent to DfE each day. No daily action will be required. The data request will include attendance and demographics.

The DfE have undertaken a [Data Protection Impact Assessment](#) in relation to this data processing.

[Old Park School](#) can reduce the requested Wonde permissions upon the integration taking place, and Wonde can assist schools with this. [Old Park School](#) also has the ability to change the permissions whenever it likes, but in doing so ensures that it has considered how that may affect its use of approved vendors (i.e. the flow of data to those vendors via Wonde for the vendors to provide the agreed service).

[Old Park School](#) will undertake the following processes:

1. Collecting personal data
2. Recording and organizing personal data
3. Structuring and storing personal data
4. Copying personal data
5. Retrieving personal data
6. Deleting personal data

By opting for a cloud-based solution the school aims to achieve the following:

1. Scalability
2. Reliability
3. Resilience
4. Delivery at a potentially lower cost
5. Supports mobile access to data securely
6. Update of documents in real time
7. Good working practice, i.e. secure access to sensitive files

Wonde provides the school with the tools to securely share data stored in the Management Information System (MIS) with third party applications (apps).

Through Wonde, schools can better manage suppliers and control exactly what data is shared with each application. The school uses apps powered by Wonde and has its own dedicated account.

Wonde connects [Synergy-Dudley Council](#), [TrainingSchoolz](#), [Tucasi](#), [Evouchers.com](#), [Relish](#), [DfE](#), [Holiday Activities](#) to the school's MIS.

It then transfers the personal information from the school's MIS to [Synergy-Dudley Council](#), [TrainingSchoolz](#), [Tucasi](#), [Evouchers.com](#), [Relish](#), [DfE](#), [Holiday Activities](#).

Synergy-Dudley Council, TrainingSchoolz, Tucasi, Evouchers.com, Relish, DfE, Holiday Activities are then kept up-to-date, as every time a school makes changes on their MIS, it will automatically change in Synergy-Dudley Council, TrainingSchoolz, Tucasi, Evouchers.com, Relish, DfE, Holiday Activities after the overnight sync.

The cloud service provider cannot do anything with the school's data unless they have been instructed by the school. The schools Privacy Notice will be updated especially with reference to the storing of pupil and workforce data in the cloud.

## Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?