

DATA PROTECTION IMPACT ASSESSMENT BY WEBSKAPE LTD

STEP 1: IDENTIFY THE NEED FOR A DPIA

<p>Explain broadly the nature of your online service, and the current stage of design or development. You may find it helpful to refer or link to other documents. Summarise when and how you identified the need for a DPIA.</p>	<p>Webskape's systems help teachers support children's learning.</p> <p>Teachers can set and monitor work by their students.</p> <p>As such, Webskape's systems record an identifier (name, initials, or generic username) for each child so the child can access online/app based resources and teachers can assign work, and track progress.</p>
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STEP 2: DESCRIBE THE PROCESSING

<p>Describe the nature of the processing: how will you collect, use, store and delete data? What are the sources 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? Does your service involve any profiling, automated decision-making, or geolocation elements? What are your plans (if any) for age-assurance? What are your plans (if any) for parental controls?</p>	<p>Collect Data - Data is provided by schools (the data controller) to Webskape and imported into our systems.</p> <p>Store data - Data is held securely by AWS in databases.</p> <p>Sharing data - Data is only shared with named sub-processors and is not transferred internationally.</p> <p>Deleting data - Data can be deleted directly by the data controller or by request to our team.</p>
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<p>Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?</p>	<p>Nature of the data - The Data we hold can include: school names, teacher names, student class name, student year group, student UPN and teacher email addresses.</p> <p>No special category of data is held.</p>
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	<p>Webskape's data retention policy can be found here: https://emile-education.com/legal/privacy/</p>
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<p>Describe the context of the processing: what is the nature of your service? Are you designing it for children? If not, are children under 18 likely to access it anyway? What is the likely age range of your users? How much control will they have? Would they understand and expect you to use their data in this way? Does your service use any nudge techniques? Are there prior concerns over similar services or particular security flaws? Is your service novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in, particularly over online risks to children? Are there any relevant industry standards, codes of practice or public guidance in this area? What responsibilities do you have under the applicable equality legislation for England, Scotland, Wales and Northern Ireland. Is there any relevant guidance or research on the development needs, wellbeing or capacity of children in the relevant age range?</p>	<p>Nature of service - Webskape's systems help teachers support children's learning. Teachers can set and monitor work by their students. As such, Webskape's systems record an identifier (name, initials, or generic username) for each child so the child can access online/app based resources and teachers can assign work, and track progress. The data to be uploaded is decided by the school processor and does not need to include any personally identifiable information.</p> <p>The Data processor can access and delete data directly.</p> <p>No nudge techniques are used.</p> <p>There are no issues of public concern.</p> <p>Webskape do not believe there are any relevant codes of practice other than the "Children's code" by the Information Commissioner's Office.</p>
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<p>Describe the purposes of the processing: what do you want to achieve with your service? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly? What are the specific intended benefits for children?</p>	<p>Purpose of processing: By having the name of a student, a teacher can more easily identify the students to whom they have allocated work and track their progress.</p>
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STEP 3: CONSULTATION PROCESS

<p>Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views - and specifically how you will seek the views of children and parents – or justify why it's not possible to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult experts in children's rights and developmental needs? If not, why not? Do you plan to consult any other experts?</p>	<p>Any significant changes to how we handle data or the data we request will be made in consultation with data controllers and if appropriate subcontractors.</p> <p>Data controllers would be requested in some cases to consult with their children/guardians.</p>
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STEP 4: ASSESS NECESSITY AND PROPORTIONALITY

<p>Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? If you use AI, how will you avoid bias and explain its use? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?</p>	<p>Webskape's lawful basis for processing data includes: consent as the data processor will be supplying the data.</p> <p>No international transfers of data shall be undertaken.</p>
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<p>Describe how you comply with the age-appropriate design code: what specific measures have you taken to meet each of the standards in the code?</p>	<p>Webskape meets all obligations of the Children's code (see https://emile-education.com/legal/privacy/)</p>
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STEP 5: IDENTIFY AND ASSESS RISKS

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall impact on individuals
Children's data (potentially name, & academic ability)	Remote – All data is	Minimal - It is unclear	Low

	held securely.	what harm (if any) could result by an individual knowing the child's name and academic ability .	
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STEP 6: IDENTIFY MEASURES TO REDUCE RISK

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5	N/A
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STEP 7: SIGN OFF AND RECORD OUTCOMES

Signed by : Position: Date:	
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