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Data protection impact assessment

Data protection impact assessment

Data protection impact assessments (DPIAs) should be used to help settings to identify the most effective way to comply with their data protection obligations. They should be used when risk assessing new data sources and processes (e.g. new technologies) before adding them to the impact asset register (IAR). This allows potential risks to be identified and control measures to be put in place. It also ensures that privacy is considered and protected at all times.

If you have not previously undertaken a DPIA for some of your data assets you may want to complete the form retrospectively to ensure all aspects of effective data management have been considered.

There are four stages to a data protection impact assessment:

- to describe the proposed use of personal data and its purpose
- to assess why the data is needed and whether its use is proportionate
- to assess the risks to the rights of the individual
- to identify what actions need to be taken to address the risks and to ensure compliance with the Data Protection Act 2017.

An example is provided below of a completed data protection impact assessment.

Service overview	
Service name	EYLOG Learning and development computer management system
Purpose of service	
<ul style="list-style-type: none">• to provide online storage and management of all learning and development records	

- *to provide secure individual accounts for parents to access their children's records*
- *to store observations, assessments and planning for individual children.*

Overview of how the service operates in terms of handling data

Eylog helps parents to understand their child's development on a more regular and real time basis. Nurseries can share learning journeys with the parents. Parents receive a unique login on the system and are notified automatically by e-mail as soon as a new observation is published. Eylog helps move away from the restrictions of a paper based learning journey by incorporating rich media (photos, videos, audios) Eylog offers fully lock-down secure tablet devices to ensure they are not misused in any manner -Facebook, e-mails, ect, are all disabled on our specially configured high security tablets. Each user has a separate user -ID and password and using a role-based access mechanism, a user is permitted to see only the information that is relevant for them. Eylog uses the Secure Sockets Layer (SSL) to encrypt all communication between the server and the tablets. All data is regularly backed-up onto redundant systems.

EYLOG Ltd. Is a limited company registered in England and Wales. Registered Number 07939645

ICO Registration Number Z3588543

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Information assessment	YES/NO
Does the service process information about individuals?	Yes
Will the project compel individuals to provide information about themselves?	Yes
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	No
Are you using information about individuals for a new purpose or in a new way that is different from any existing use?	Yes
Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics, facial recognition or location tracking.	No
Is the information to be used about individuals' health and/or social wellbeing?	Yes

Does the information contain any financial details? (Including individuals or businesses)		No
Will the project result in personal information being accumulated?		Yes
Information flows		
The collection, use and deletion of personal data should be described here.		
Type of personal data being used :	<i>Children's names, addresses and DOB</i> <i>Parents' names / Carer status</i> <i>Learning and development assessments</i> <i>Observations</i>	
Data origin	<i>Collected via parents</i> <i>Collected through observation and evaluation</i>	
Data is shared with?	<i>Practitioners, managers, and parents of individual children</i>	
Brief Description of the flow of data/information	<i>Information collected from parents</i> <i>Detailed information collected through observation and evaluation (paper-based)</i> <i>Detailed information collated above inputted into database</i> <i>Parents access information inputted by setting staff for example observations.</i>	
Legal Requirements		
Are there any legal enablers or legislation, of which you are aware, that aid in the use of personal information for the purposes you have specified in this questionnaire? If so, please specify in the 'further information' section (below).	<i>It is a legal requirement under the EYFS to collate information on children's learning and development progress. Information will have to be provided to Ofsted on a regular basis through inspection.</i>	
Further information – Please provide any further information that will help in determining the Data Protection impact.		

DPIA outcome		
Does the system require further assessment for compliance?		
System assessment needed:		<i>Yes, a supplier's questionnaire must be completed before sign-off.</i>
Risks (Privacy / Availability / Integrity)		
List any identified risks to privacy and personal information of which the project is currently aware.		
Risk description (to individuals, to the Authority or to wider compliance)	Proposed risk solution (Mitigation)	Is the risk reduced, transferred, or accepted? Please specify / justify.
<i>Information could be accessed by unauthorised persons.</i>	<i>All parents will have secure passwords and information will be encrypted to prevent unauthorised access.</i>	<i>Subject to an acceptable supplier's questionnaire being received, the risk will be accepted.</i>
Final assessment		
System assessment reference:		EYLOG
System addresses identified risks:		Yes

System is DPA compliant:		Yes	
System is fit for purpose:		Yes	
Sign off name	Sign off role	Date	Signature
Marita Pidgeon	Centre manager	18/04/2018	
Gareth Short	Safeguarding Officer	18/04/2018	

Once completed the asset can be added to the information asset register. NB The data protection impact assessment only needs to be completed for new data assets where there is likely to be a significant change or addition to existing working practices.

This was adopted at a meeting of The Board of Trustees at Pelican Children's Centre

Held on.....

Date to be reviewed.....

Signed on behalf of the board of trustees.....

Name of signatory.....

Role within the centre.....