

Cool Milk

Data Protection Impact Assessment



Organisation Name/Data Controller Name: North Stainley CofE Primary School

Date final DPIA issued 12/03/2021

REF (if applicable)

Project Brief and Go Live Date:

Cool Milk holds details of the children's names and dates of births to allocate eligible children their free milk. It is also used by parents to purchase milk for their child who is not eligible to free milk (nursery milk or Pupil premium).

Go live date: 7/1/2021

Project Manager/Owner:

| | |
|------------|-------------------------------------------------|
| Name: | Louise Wallen |
| Job Title: | Headteacher |
| Service: | |
| Telephone: | 01765635276 |
| Email: | Headteacher@northstainley.n-yorks.sch.uk |

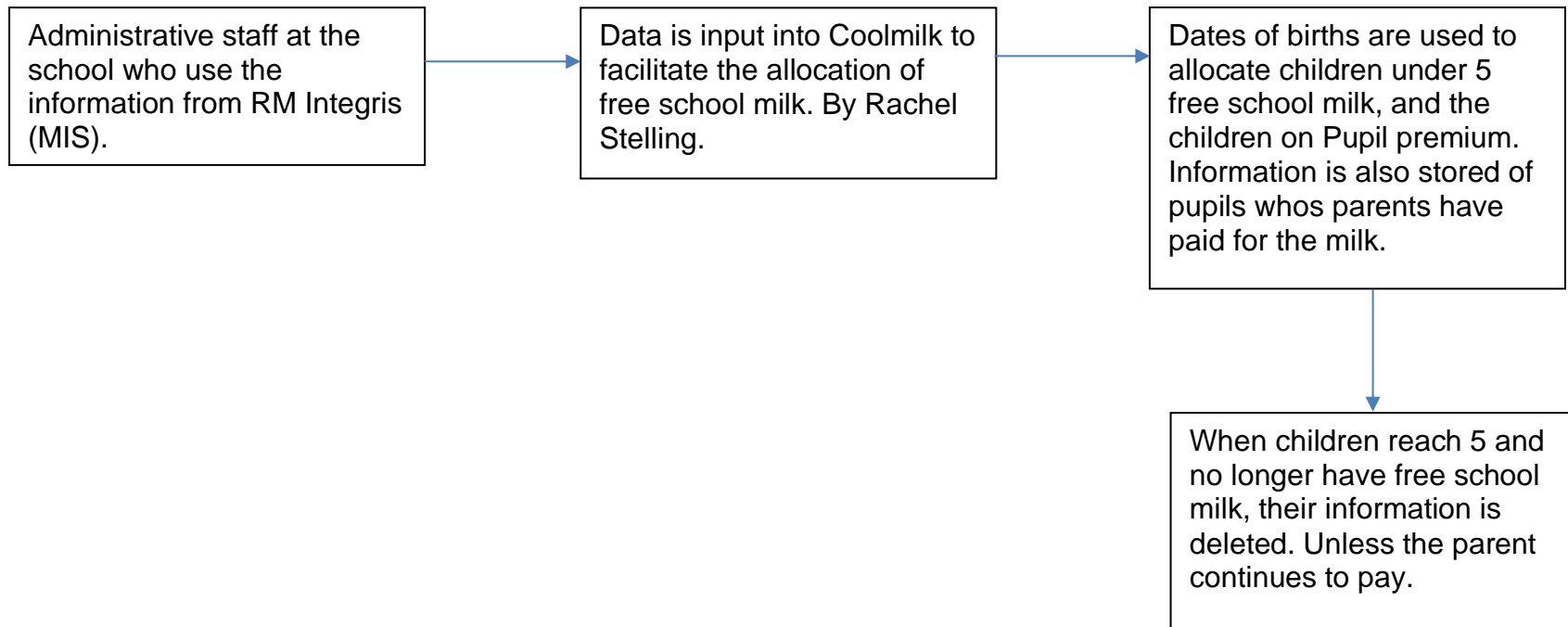
Information Asset Owner/s:

| | |
|------------|-------------------------------------------------|
| Name: | Louise Wallen |
| Job Title: | Headteacher |
| Service: | |
| Telephone: | 01765635276 |
| Email: | Headteacher@northstainley.n-yorks.sch.uk |

System Administrator/ICT Contact (if applicable):

| | |
|------------|-------------------------------------------|
| Name: | Rachel Stelling |
| Job Title: | Administrator |
| Service: | |
| Telephone: | 01765635276 |
| Email: | admin@northstainley.n-yorks.sch.uk |

PART ONE – INFORMATION FLOW



PART TWO – PRIVACY RISKS QUESTIONNAIRE

| Privacy Issue | Comments | Is there a risk? Address in Part Three | |
|--------------------------------------------------------|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------|--------------------------|
| 1. General | | | |
| Have you identified the Information Asset Owner? | <i>Louise Wallen</i> | <input type="checkbox"/> | |
| How many individuals will be affected by this project? | <i>52</i> | <input type="checkbox"/> | |
| Who are the Data Subjects? | <i>Pupils</i> | <input type="checkbox"/> | |
| Please select any information that will be processed: | Personal Identifiers/information | Special Category | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Sex life | |
| | <input checked="" type="checkbox"/> Address/Postcode | <input type="checkbox"/> Sexual Orientation | |
| | <input checked="" type="checkbox"/> Date of Birth | <input type="checkbox"/> Religion | |
| | <input checked="" type="checkbox"/> Telephone Number/Email | <input type="checkbox"/> Philosophical belief | |
| | <input type="checkbox"/> Emergency contact details | <input type="checkbox"/> Political opinion | |
| | <input type="checkbox"/> National Insurance Number | <input type="checkbox"/> Trade Union Membership | |
| | <input type="checkbox"/> NHS Number | <input type="checkbox"/> Ethnic Origin | |
| | <input type="checkbox"/> Gender | <input type="checkbox"/> Medical history details | |
| | <input type="checkbox"/> Images (photo/film) | <input type="checkbox"/> Physical health information | |
| | <input type="checkbox"/> Pseudonymised information | <input type="checkbox"/> Mental health information | |
| <input type="checkbox"/> IP addresses | <input type="checkbox"/> Genetic/Biometric (eg. Thumbprint) | | |
| <input type="checkbox"/> | Other (please state): Call History, Call Quality data, Support/Feedback data, | Because of the nature of recorded conversations, there is the potential for | |

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| | | Diagnostic and service data. Video/audio recordings of calls. | | special category data to be discussed. | |
| How will the personal data be collected? | Other (please state) | | | <input type="checkbox"/> | |
| | From another Internal system (integris) | | | | |
| Does this processing include data matching, automated decision making or profiling? (please describe) | No. | | | <input type="checkbox"/> | |
| 2. Lawfulness, Fairness, and Transparent | | | | | |
| What is the lawful basis for processing personal information? If you are using more than one condition please specify which condition relates to specific data. <i>(Please speak with your DPO about this)</i> | d) Vital Interests | | Choose an item. | | <input type="checkbox"/> |
| | For children to be supplied with free school milk that they are entitled to before 5 years old, or if they are on pupil premium. Also for students whos parents are paying into coolmilk for their child. | | | | |
| If you are processing Special Category Information what is the lawful basis for processing this information <i>(Please speak with your DPO about this)</i> | N/A | | Choose an item. | | <input type="checkbox"/> |
| | Basis in law and schedule condition (if applicable)/specify: N/A | | | | |
| If you are using consent how are you collecting this and how will people be able to withdraw their consent? | Not relying on consent. | | | <input type="checkbox"/> | |
| How will you tell people about this processing? | Nursery milk signposting | | | <input type="checkbox"/> | |
| Do you need to update your privacy notices? | <input type="checkbox"/> | Yes | | | <input checked="" type="checkbox"/> |
| | <input checked="" type="checkbox"/> | No | | | |

| 3. Purpose Limitation | | | |
|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Are you going to use information you already hold about individuals for a purpose it is not currently used for? | <input type="checkbox"/> | Yes | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> | No, information is already held under the lawful basis of Public Task, as it is required for the provision of education, or under contractual obligation in line with employment law for staff. | |
| Have you identified all of the purposes for which you will use personal information? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> |
| | <input type="checkbox"/> | No. If no, why not? | |
| Will people expect their information to be processed in this way? | <input checked="" type="checkbox"/> | Yes – for their child to receive the milk | <input type="checkbox"/> |
| | <input type="checkbox"/> | No, please give details: | |
| 4. Data Minimisation | | | |
| How will you ensure you are only collecting information that is relevant to this specific purpose? | No other information is put onto the coolmilk system. Only the names and DOB | | <input type="checkbox"/> |
| Have you considered what information you could disregard without compromising the project? | <input type="checkbox"/> | Yes, please detail if any has been removed: | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> | No | |
| 5. Accuracy | | | |
| How are you going to ensure that the personal information will be kept accurate and up to date? | The child is deleted off the system when they turn 5 unless they are PP or parents are paying as the school has to pay. The details are checked each week as admin receive an email each week to verify the details on account. | | <input type="checkbox"/> |

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| How are you going to ensure that the quality of the data you collect is sufficient for your intended purpose? | Data will be double checked when added and then removed when coolmilk no longer requires it. | | <input type="checkbox"/> |
| If you are procuring a new system does it allow you to amend and / or delete information when necessary? <i>(Consult IT as necessary)</i> | <input checked="" type="checkbox"/> | Yes. | <input type="checkbox"/> |
| | <input type="checkbox"/> | No, please give details: | |
| | <input type="checkbox"/> | Notes can be added to the system where accuracy is disputed | |
| | <input type="checkbox"/> | N/A | |
| 6. Storage Limitation / Records Management | | | |
| How long will the information be kept for? (retention period) | Until the child is 5 / leaves school / no longer pay for milk + 2 academic years. | | <input type="checkbox"/> |
| Are you procuring a system that will allow you to delete information in line with your retention periods? <i>(Consult IT as necessary)</i> | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> |
| | <input type="checkbox"/> | No, if no why not? | |
| | <input type="checkbox"/> | N/A | |
| What method will be used, to securely destroy paper and/or electronic records? <i>(Consult IT/processor as necessary)</i> | The administrator can delete the children and end milk supply. | | <input type="checkbox"/> |
| Will destruction be certificated or added to a destruction log? | <input type="checkbox"/> | Yes | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> | No | |

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| Where will information be stored/accessed? | Cloud based application | <input type="checkbox"/> |
| | Customer data is stored on our secure servers at our offices in Lincoln, United Kingdom. We never share the data with any third parties other than with government agencies for audit purposes. | |
| If you are using a 'Cloud Based' system to store or transfer information, where is the geographical location of the server/s? | | <input type="checkbox"/> |
| If back up information is stored off-site, where is the geographical location? | Customer data is stored on our secure servers at our offices in Lincoln, United Kingdom. We never share the data with any third parties other than with government agencies for audit purposes. | <input type="checkbox"/> |
| 7. Security | | |
| Who will have access to the information within the organisation? | Roles: Headteacher & Administrator | <input type="checkbox"/> |
| What controls have been put in place to limit access to the information? | Password protection. | <input type="checkbox"/> |
| If you are implementing a new system, does this system have the ability to audit access (audit trails)? | <input type="checkbox"/> Yes. | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> No | |
| | <input type="checkbox"/> N/A | |
| Does your new system/hardware/procedure provide adequate protection against security risks? Please detail. (Consult IT as necessary) | Password protection https://www.coolmilk.com/privacy-cookie-policy/ | <input checked="" type="checkbox"/> |
| Are staff undertaking any additional training to help use new | <input type="checkbox"/> Yes (please give details) | <input type="checkbox"/> |

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| systems/procedures? Will this include Data Protection training? | <input checked="" type="checkbox"/> | Staff do not use the coolmilk system. Training is given to admin when starting the role. | |
| Is there a disaster recovery plan in place in case of equipment/software failure? <i>(you may need to ask your provider to supply this)</i> | <input checked="" type="checkbox"/> | Yes See PDF | <input type="checkbox"/> |
| | <input type="checkbox"/> | No | |
| 8. Data Processors – Data Processors should be listed after part 2 of this form | | | |
| If you are using a data processor, how has the provider demonstrated an adequate level of information security? <i>(you may need to ask your provider to supply this)</i> | | | <input type="checkbox"/> |
| If using a data processor, how has the provider demonstrated that they are compliant with GDPR? <i>(you may need to ask your provider to supply this)</i> | | | <input type="checkbox"/> |
| If using a data processor, do you have a written contract in place with GDPR clauses? | <input type="checkbox"/> | <input type="checkbox"/> | |
| | <input type="checkbox"/> | No | |
| | <input type="checkbox"/> | N/A | |
| 9. Information Sharing – Data Controllers should be listed after part 2 of this form | | | |
| What is the legal basis for sharing? <i>(Please speak with your DPO about this)</i> | | N/A – only sharing with processors. | <input type="checkbox"/> |
| Is there a sharing agreement in place? | <input type="checkbox"/> | Yes (please attach) | <input type="checkbox"/> |
| | <input type="checkbox"/> | No. If no, why not? | |

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| (Please speak with your DPO about this) | <input checked="" type="checkbox"/> | N/A | |
| Will you transfer information outside of the UK, where will this be? | <input type="checkbox"/> | Yes, please specify where: | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> | No | |
| | <input checked="" type="checkbox"/> | N/A | |
| How will information be transferred? | N/A | | <input type="checkbox"/> |
| 10. Rights of the Data Subject | | | |
| How will you manage 'Subject Access Requests' or other requests regarding information rights? (Rectification, erasure, objection, and restriction etc.) | Requests will be handled in line with the school's policy. Requests made to coolmilk will be passed to the school | | <input type="checkbox"/> |
| If procuring a new system, will this allow you to fulfil the rights of the data subject mentioned above? | <input checked="" type="checkbox"/> | Yes, detail as needed: Access to information and ability to amend and delete is available. | <input type="checkbox"/> |
| | <input type="checkbox"/> | No | |
| If the project involves automated decision making do you have a process in place to facilitate human intervention? Please detail. | N/A | | <input type="checkbox"/> |
| Will your data processing exclude individuals from using a service or from exercising any rights? | <input type="checkbox"/> | Yes, detail as needed: | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> | No | |
| 11. Accountability | | | |
| As a result of this project do you need to update any of the following? | <input checked="" type="checkbox"/> | Information Asset Register | <input checked="" type="checkbox"/> |
| | <input type="checkbox"/> | Policies | |

| | | | |
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| If you are updating any policies or procedures please also tick these. | <input type="checkbox"/> | Procedures | |
| If needed, have you consulted relevant stakeholders/ICO? What was the outcome? | <input type="checkbox"/> | Yes, who? please add outcome details: | <input type="checkbox"/> |
| | <input checked="" type="checkbox"/> | No | |

List any Data Controllers information will be shared with (if applicable):

| | |
|-------------------------|-----|
| Name: | N/A |
| Contact Details: | |
| Name: | |
| Contact Details: | |
| Name: | |
| Contact Details: | |
| Name: | |
| Contact Details: | |

List any Data Processors information will be processed by (if applicable):

| | |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name: | Microsoft |
| Contact Details: | https://support.microsoft.com/en-us/home/contact?ContactUsExperienceEntryPointAssetId=S.HP.teams |
| Name: | |
| Contact Details: | |
| Name: | |
| Contact Details: | |

| | |
|-------------------------|--|
| Name: | |
| Contact Details: | |

PART THREE – RISK EVALUATION

| Privacy Risks (from part two) Describe source of risk and potential impact on individuals, compliance and school risks | Options to reduce or eliminate risk | Evaluation Is the risk eliminated, reduced or accepted? |
|----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| Data input error or staff using the system incorrectly | Make sure all staff using the system have had training or know where to ask for help. | reduced |
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PART FOUR – SIGNATURES AND REVIEW

Information Asset Owner

Name: Louise Wallen

Job Title: Headteacher

Date: Click or tap to enter a date.

Signature:

Data Protection Officer

Name:

Job Title:

Date: Click or tap to enter a date.

Signature:

Senior Officer (if applicable)

Name:

Job Title:

Date: Click or tap to enter a date.

Signature:

REVIEW DATE: Click or tap to enter a date. 12/3/2022