

ParentPay
Data Protection Impact Assessment

Organisation Name/Data Controller Name: North Stainley Primary School Date final DPIA issued <small>Click or tap to enter a date.</small> [Title]
Project Brief and Go Live Date: Parentpay is a cashless payment system set up for payment or trips, meals clubs and any other income related to the school transactions. ParentPay ParentPay is an online payment system allowing the parents/guardians of the students to pay for their meals, school trips, and extra circular activities as well as school uniform etc. The software has a communication system so the school office can easily send out important information and updates to parents via text message and/or email. The software also has a reporting function and auditable system (via audit trails). This will prevent the requirement for cash to be brought onto the school premises allowing the school to run on a largely cashless basis. This reduces the risk of cash being lost and the need for cash to be handled by the school. The reporting and audit functions allow for the effective management of school finances electronically. A DPIA is required due to the sharing of students and parents/guardians financial data (and limited personal data) with an external processor. Go live date: 19/11/21

Project Manager/Owner:

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

Information Asset Owner/s:

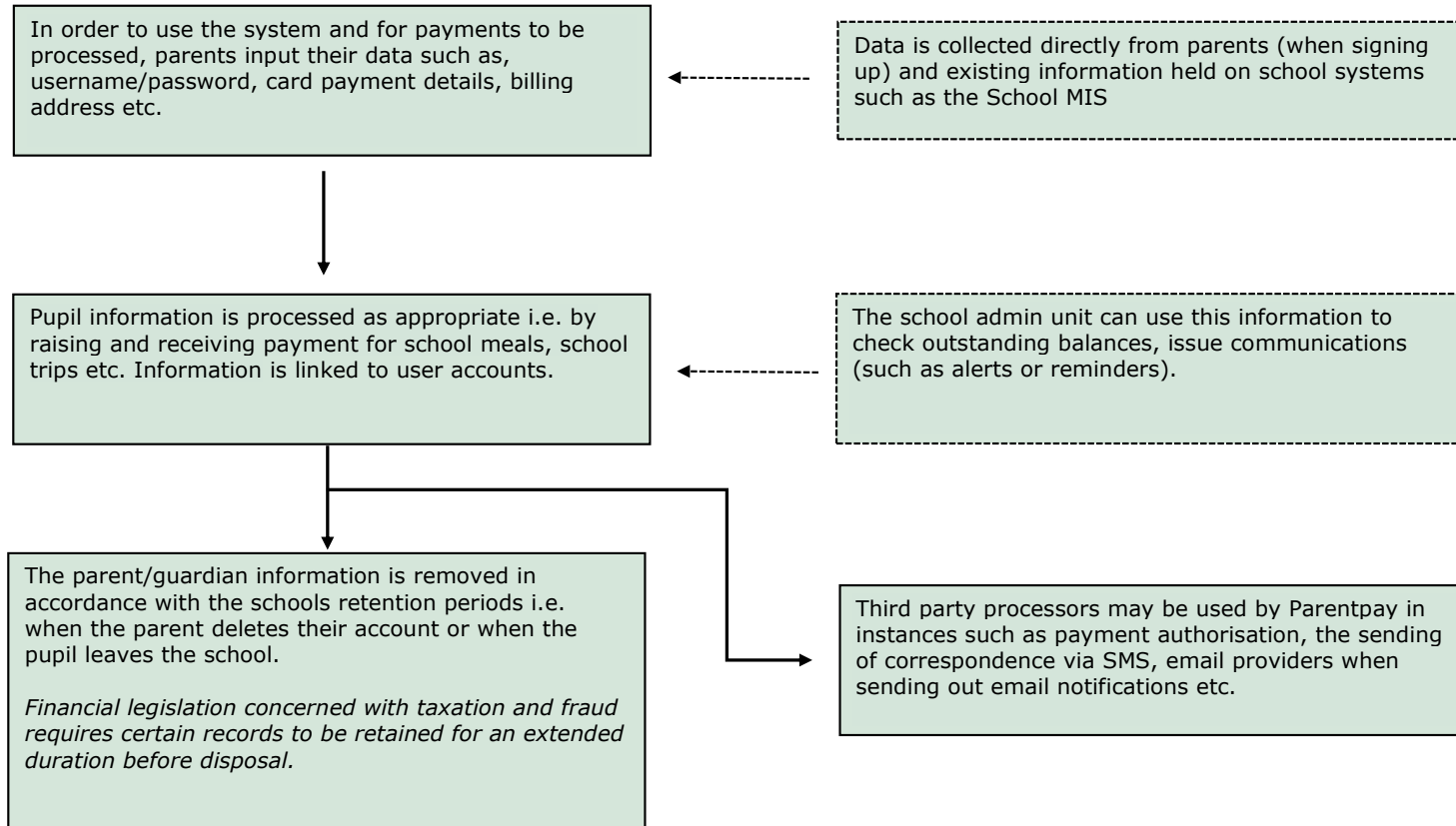
Name:	Louise Wallen
Job Title:	Headteacher
Service:	
Telephone:	01765635276
Email:	headteacher@northstainley.n-yorks.sch.uk

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

The collection, use and deletion of personal information should be described here. Please use a flow diagram or another visual way of explaining information flows.



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?	Louise Wallen	<input type="checkbox"/>	
How many individuals will be affected by this project?	Staff, volunteers, Governors, Pupils and Parents	<input type="checkbox"/>	
Who are the Data Subjects?	Students and the Parents/guardians of students enrolled with the school that use this online payment software. As well as staff governors and volunteers who have lunches	<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 checked="" 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 checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Medical history details	
	<input type="checkbox"/> Images (photo/film)	<input checked="" type="checkbox"/> Physical health information	
	<input type="checkbox"/> Pseudonymised information	<input type="checkbox"/> Mental health information	
	<input checked="" type="checkbox"/> IP addresses	<input type="checkbox"/> Genetic/Biometric (eg. Thumbprint)	
<input checked="" type="checkbox"/> Other (please state):			

Privacy Issue	Comments		Is there a risk? Address in Part Three
	Student data usernames/numbers, cohort Inc. year group/form group. Username and password Passport details Financial information such as bank details inputted when making payments.		
How will the personal data be collected?	Directly from the Individual through their use of the online payment system. Other: The school will upload some information that is already held.		<input type="checkbox"/>
Does this processing include data matching, automated decision making or profiling?	No.		<input type="checkbox"/>
2. Lawfulness, Fairness, and Transparency			
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.	e) Public Task (specify)	Choose an item. Specify: The system facilitates the cashless payment of school meals, uniform, extracurricular activities etc. The ability for the school to receive correct payment and therefore fulfil their educational responsibilities such as the provision of education by administering school meals (in addition to trips/ extra-curricular activities etc) as obligated by law.. Children receiving a high quality education in a safe learning environment is in the public interest. Therefore, it is in the public interest to ensure school meals are administered effectively. Relevant legislation includes (but not necessarily limited to): Education Act 1944,1996, 2002, 2011 Education (Information About Individual Pupils)(England) Regulations 2013 Education (Pupil Information) (England) Regulations 2005	<input type="checkbox"/>

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	Education and Skills Act 2008		
If you are processing Special Category Information what is the lawful basis for processing this information	Choose an item.	g) Reasons of substantial public interest (identify condition 6 – 28 in guidance)	<input type="checkbox"/>
	6. Statutory and Government purposes 16. Support for individuals with a particular disability or medical condition 18. Safeguarding of children and individuals at risk		
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?	The school will be writing to all parents/guardians to inform them of the schools use of this software and contact details of which they can direct any questions or concerns. They will be provided with guidance on how to use this software. This will be communicated via letter, email, bulletin/newsletter, website notice etc.		<input type="checkbox"/>
Do you need to update your privacy notices?	<input type="checkbox"/>	Yes	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	No Unless notified by ParentPay that part of the contract has been subcontracted out to a third party provider. In this instance it is advised that your Privacy Notice is updated to take account of this processing.	
3. Purpose Limitation			
	<input type="checkbox"/>	Yes	<input type="checkbox"/>

Commented [AJ1]: Please can I check – are you communicating this to parents using all these techniques? Please can you just ensure you have made this applicable to your school.

Privacy Issue	Comments		Is there a risk? Address in Part Three
Are you going to use information you already hold about individuals for a purpose it is not currently used for?	<input checked="" type="checkbox"/>	No – Information is already held by the school in order to fulfil the needs of students such as accessibility to ‘free school meals’ support, dietary requirements, emergency contact details etc.	
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"/>	<p>Yes – Individuals can reasonably expect the school to use their data identified above in order to process the payments required to provide meals etc.</p> <p>Guidance and the necessary communications will be delivered as appropriate to ensure the effective transition towards this cashless online payment system maintaining a line of communication between the schools and parents/guardians ensuring they are fully informed. They will be given the opportunity to express any concerns, which the school will give appropriate consideration.</p>	<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?	Data is restricted to only that necessary to operate the ParentPay system. ParentPay (the processor) are collecting the necessary information as set out in their privacy notice. https://www.parentpay.com/privacy-policy/		<input checked="" type="checkbox"/>
Have you considered what information you could disregard without compromising the project?	<input checked="" type="checkbox"/>	Yes, please detail if any has been removed: Only relevant information required by ParentPay software in order to ensure its functionality is provided to the processor.	<input type="checkbox"/>

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	<input type="checkbox"/>	No	
5. Accuracy			
How are you going to ensure that the personal information will be kept accurate and up to date?	Parents are able to access their data which is held by their online account and therefore are able to update their information with the relevant changes such as moving house, changing telephone number etc. Schools can also make updates as required.		<input type="checkbox"/>
How are you going to ensure that the quality of the data you collect is sufficient for your intended purpose?	Information is kept up to date on integris and this is transferred onto Parentpay by running a centrally hosted upload		<input type="checkbox"/>
If you are procuring a new system does it allow you to amend and / or delete information when necessary?	<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)	<p>When a centrally hosted upload is run – all information of students and parents who have left is removed off parentpay.</p> <p>ParentPay state the following disposal criteria/ retention periods in their privacy notice (below). Data is therefore appropriately disposed of when the following criteria are met.</p> <p><i>'We will only retain information for as long as is necessary to deliver the service safely and securely. We may need to retain some records to</i></p>		<input type="checkbox"/>

Privacy Issue	Comments	Is there a risk? Address in Part Three
	<p><i>maintain compliance with other applicable legislation – for example finance, taxation, fraud and money laundering law requires certain records to be retained for an extended duration, in some cases for up to seven years.</i></p> <p><i>Pupil data will typically be removed or anonymised when the following rules are met:</i></p> <ul style="list-style-type: none"> •<i>The pupil has been archived by the School for longer than one month.</i> •<i>The pupil does not have any meal consumption or attendance data within the last 13 months.</i> •<i>The pupil has not received a payment for any payment item within the last 13 months.</i> •<i>The pupil balance is zero.</i> <p><i>Payer (Parent) data will usually be removed or anonymised when the following rules are met:</i></p> <ul style="list-style-type: none"> •<i>They have not logged in for 13 months.</i> •<i>They have not topped up or spent within the last 13 months.</i> •<i>Parent balance is 0 (zero), and all pupil balances are 0 (zero).</i> •<i>There are no active pupils associated with the account</i> <p><i>Manager Accounts that have been disabled and have not logged in for 13 months, will be removed or anonymised. Other school staff accounts are subject to the same rules as pupils (above)</i></p> <p><i>Message attachments will be removed after 24 months.</i></p> <p><i>File area uploads will be purged after 24 months.</i></p> <p><i>Personal information in trip records will be removed 1 month after trip completion</i></p> <p><i>It should be noted that Schools will still retain a complete finance audit trail for their statutory requirements. In unusual cases where specific</i></p>	

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	<i>personal information needs to be retained, then this can be facilitated upon request."</i>		
Are you procuring a system that will allow you to delete information in line with your retention periods?	<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?	When a centrally hosted upload is run – all information of students and parents who have left is removed off parentpay. Paper records are destroyed in confidential waste.		<input type="checkbox"/>
Will destruction be certificated or added to a destruction log?	<input checked="" type="checkbox"/>	Yes, please specify: destruction log	<input type="checkbox"/>
	<input type="checkbox"/>	No, if no why not?	
Where will information be stored/accessed?	Cloud based application		<input type="checkbox"/>
	Other (specify):		
If you are using a 'Cloud Based' system to store or transfer information, where is the geographical location of the server/s?	16.5 All ParentPay Data is stored in UK datacentres(with the exception of support tickets, which may be processed in the USA, subject to necessary safeguards - EU Approved Model Contract Clauses, and US Privacy Shield) ParentPay give assurance that when data is processed outside of the EEA, such as Sendgrid (USA) appropriate technical and operational safeguards are in place.		<input checked="" type="checkbox"/>
If back up information is stored off-site, where is the geographical location?			<input type="checkbox"/>
7. Security			

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Who will have access to the information within the organisation?	Roles: Administrator and Headteacher	<input type="checkbox"/>
What controls have been put in place to limit access to the information?	Login details are kept secure and only accessible by the Headteacher or the administrator	<input type="checkbox"/>
If you are implementing a new system, does this system have the ability to audit access (audit trails)?	<input checked="" type="checkbox"/> Yes https://www.parentpay.com/schools/features/security/compliance/	<input type="checkbox"/>
	<input type="checkbox"/> No	
	<input type="checkbox"/> N/A	
Does your new system/hardware/procedure provide adequate protection against security risks? Please detail.	<p>As stated in ParentPay's privacy notice they are</p> <p>Subject to routine audits by a number of organisations including extensive technical and security due diligence by local authorities, central government departments and UK banks, as well as external audits. ISO 27001 Certified – certified by a UKAS accredited certification body. PCI-DSS Level 1 Certified. Cyber Essentials Plus Certified Registered as a Data Processor with the Information Commissioners Office REG: Z7380292</p> <p>Further information relating to incident response, physical security, access control, network security and data protection is found in the ParentPay RFI document (2020).</p>	<input type="checkbox"/>

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Are staff undertaking any additional training to help use new systems/procedures? Will this include Data Protection training?	<input checked="" type="checkbox"/>	Yes (please give details) Training is provided through schools ICT and given to new staff by the administrator if they are allowed to access ParentPay	<input type="checkbox"/>
	<input type="checkbox"/>	No. If no why not?	
Is there a disaster recovery plan in place in case of equipment/software failure?	<input checked="" type="checkbox"/>	Yes (as in RFI document).	<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?	https://www.parentpay.com/schools/features/security/ https://www.parentpay.com/privacy-policy/ Parentpay has demonstrated a level of information security offering a system with <i>end to end encryption</i> which has been subject to both internal and external audit. Parentpay state these measures protect the confidentiality, integrity and availability of your personal information during storage, processing and transit. Parentpay are: ISO 27001 Certified – certified by a UKAS accredited certification body. PCI-DSS Level 1 Certified. Cyber Essentials Plus Certified. Registered as a Data Processor with the Information Commissioners Office REG: Z7380292		<input type="checkbox"/>
If using a data processor, how has the provider demonstrated that they are compliant with GDPR?	Veritau has reviewed documentation provided by ParentPay and granted full assurance. All mandatory clauses are present in the DPA section of the terms and conditions. Additional information is contained both here and in the RFI document provided by ParentPay. Some data may be transferred outside		<input type="checkbox"/>

Privacy Issue	Comments	Is there a risk? Address in Part Three
	<p>of the EEA but the terms and conditions state these transfers will be subject to necessary safeguards as defined within applicable Data Protection Law.</p> <p>Registered as a Data Processor with the Information Commissioners Office REG: Z7380292 https://www.parentpay.com/parentpay-and-gdpr/ https://www.parentpay.com/schools/features/security/compliance/</p>	
If using a data processor, do you have a written contract in place with GDPR clauses?	<input type="checkbox"/> Yes (please attach)	<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?	They are a processor on behalf of the school.	<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?	
	<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 type="checkbox"/> No	
	<input checked="" type="checkbox"/> N/A	
How will information be transferred?	N/A	<input type="checkbox"/>

Commented [AJ2]: Please ensure you have copy of the data processing contract from Parent Pay. We were sent a copy by another school and have checked it to give it full assurance, but you will need to make sure you have your own copy.

Privacy Issue	Comments		Is there a risk? Address in Part Three
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.		<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 – Parents can access, amend and request deletion of data.	<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	<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 type="checkbox"/>
	<input type="checkbox"/>	Policies	
	<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 type="checkbox"/>	No	

Privacy Issue	Comments	Is there a risk? Address in Part Three

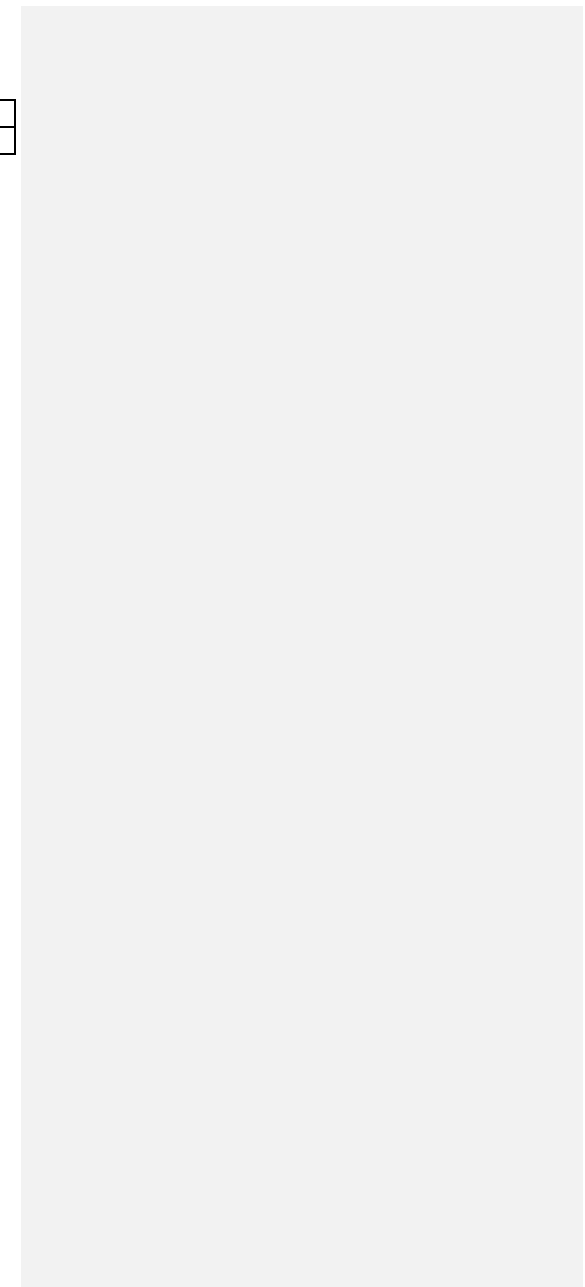
List any Data Controllers information will be shared with (if applicable):

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:	ParentPay
Contact Details:	dpo@parentpay.com Data Protection Officer ParentPay Ricoh Arena Phoenix Way Coventry CV6 6GE
Name:	
Contact Details:	
Name:	
Contact Details:	

Name:	
Contact Details:	



Part Three – Risk Evaluation

Privacy Risks (from part two)	Options to reduce or eliminate risk	Evaluation
Describe source of risk and potential impact on individuals, compliance and school risks		Is the risk eliminated, reduced or accepted?
Data is potentially held for longer than usual retention periods to comply with financial legislation regarding taxation and fraud etc.	Due to the need to comply with such legislation – retention periods must be set as appropriate.	Accepted
Potential for sensitive information such as parents’ bank details to be disclosed in the event of a security incident.	Parentpay state they are fully compliant with GDPR and the DPA. They are also <ul style="list-style-type: none"> •ISO 27001 Certified – certified by a UKAS accredited certification body. •PCI-DSS Level 1 Certified. •Cyber Essentials Plus Certified. Demonstrating a degree of assurance with regarding to data security.	Reduced
The ParentPay software is not currently included on the Information Asset Register, so the school is not compliant with its Article 30 (records of processing) obligations.	The ParentPay software will be added to the Information Asset Register as a Data Processor.	Accepted
Some data may be transferred outside of the EEA.	The terms and conditions state these transfers will be subject to necessary safeguards as defined within applicable Data Protection Law.	Accepted

Part Four – Signatures and Review

Information Asset Owner
Name: Louise Wallen
Job Title: Headteacher
Date: 19/11/2021
Signature: L.Wallen

Data Protection Officer
Name: Joanne Atterton (on behalf of Veritau)
Job Title: Information Governance Officer
Date: 24/11/2021
Signature: J Atterton

Senior Officer (if applicable)
Name:
Job Title:
Date: Click or tap to enter a date.
Signature:

REVIEW DATE: 19/11/2022