Data Protection Impact Assessment Screening Questionnaire

To confirm whether a full DPIA is required please go through the below and tick any boxes that are relevant.

Ref number:	
Name and Job title:	**Rachelle White School Admissions Manager**
Date:	**06/11/2025**
Description - Explain broadly what you aim 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, business case etc.	
To determine admission arrangements for 2027-2028 admissions following a consultation as required by School Admissions Code 2021	

Are you:

☒ starting a new (or reviewing an existing) project involving the use of personal data.

Are you planning to carry out any

☐ evaluation or scoring

☐ automated decision-making with significant effects;

☐ systematic monitoring;

☐ processing of sensitive data or data of a highly personal nature

☐ processing on a large scale

☐ processing of data concerning vulnerable data subjects

☐ innovative technological or organisational solutions

☐ processing that involves preventing data subjects from exercising a right or using a service or contract.

☐ profiling to make decisions about people

☐ automated decision-making to make decisions about people

☐ process special-category data or criminal-offence data

☐ systematically monitor a publicly accessible place eg CCTV

☐ use innovative technology in combination with any of the criteria in the European guidelines

☐ use profiling to help make decisions on someone's access to a service, opportunity or benefit

☐ use automated decision-making to help make decisions on someone's access to a service, opportunity or benefit

☐ use special category data to help make decisions on someone's access to a service, opportunity or benefit

☐ carry out profiling on a large scale

☐ process biometric or genetic data in combination with any of the criteria in the European guidelines

☐ combine, compare or match data from multiple sources

☐ process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines

☐ process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines

☐ process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them

☒ process personal data that could result in a risk of harm in the event of a breach

☐ a change to the nature, scope, context or purposes of existing processing

If you have ticked any of the boxes above, you must complete a full DPIA. Please contact information.governance@york.gov.uk who will be able to advise and support you to do this

If you have not ticked any of the boxes above, you are not required to complete a full DPIA. However, we must record all decision making regarding DPIA, so please send your completed screening questionnaire to information.governance@york.gov.uk

Data Protection Impact Assessment (DPIA)

Why do I need to complete a DPIA?

This process is a mandated legal requirement of data protection legislation to ensure that privacy concerns have been considered and actioned to ensure the security and confidentiality of the personal identifiable information.

When do I need to complete a DPIA?

This document must be completed for any proposed, new or change in process, service, technology, or project which may or will be processing personal identifiable information. It must be completed before change, implementation, or procurement.

Who should complete a DPIA?

The DPIA should be initiated and completed by either the relevant Project Manager, Manager or Information Asset Owner/Administrator (IAO/IAA) [Intranet | Information on the roles of SIRO, IAO, IAA, DPO and CG (york.gov.uk)](#) in the area proposing the change.

It is advisable to include the following where appropriate:
- information governance team
- ICT & information security team
- web services team
- legal services
- procurement
- relevant stakeholders
- any data processors (including 3rd party suppliers)

Following completion of the DPIA, if it identifies a high risk and you cannot do anything to reduce it, we must consult with the ICO as set out in data protection legislation. You must not go ahead with the processing until this has been done and the ICO has provided their decision or outcome [Do we need to consult the ICO? | ICO](#) You must contact information.governance@york.gov.uk who will lead on this with the ICO.

The DPIA must be approved and signed by the IAO/IAA or appropriate senior manager before the system goes live and/or the new or changes to processing, starts.

What Next?

Please complete the screening questionnaire on the next page, if you answer yes to any of the screening questions you will be required to complete the full DPIA with as much detail as possible and return the completed from to information.governance@york.gov.uk

Further guidance on DPIAs can also be found on the Information Commissioner's website www.ico.gov.uk

What does 'large scale' mean?

The legislation does not contain a definition of large-scale processing, but to decide whether processing is on a large scale you should consider:
- the number of individuals concerned.
- the volume of information.
- the variety of information.
- the duration of the processing; and
- the geographical extent of the processing.

Examples of large-scale processing include:
- a hospital (but not an individual doctor) processing patient information.
- tracking individuals using a city's public transport system.
- an insurance company or bank processing customer information.

- a search engine processing data for behavioural advertising; or
- a telephone or internet service provider processing user information.

Data Protection Impact Assessment Screening Questionnaire

To confirm whether a full DPIA is required please answer the below questions for how you are planning to or already do use, personal identifiable information e.g. personal data, special categories of personal data or criminal offence and conviction data

Ref number:	
Name and Job title:	**Rachelle White School Admissions Manager**
Date:	**06/11/2025**
Description - Explain broadly what you aim 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.	

To determine admission arrangements for 2027-2028 admissions following a consultation as required by School Admissions Code 2021 which is an annual process.

As part of the consultation, respondents can provide their response to the draft admission arrangements via an online surveymonkey which asks for the personal details (name, address, contact details, position (if applying for a school or MAT)) a response can be provided without these.

This information is collated by surveymonkey and passed to the School Admission Manager for consideration as part of the consultation process. The details of the respondent is not shared within the Admission Consultation report.

This information is kept securely within CYC folders with limited access to CYC staff only.

If a response is regarding a Multi Academy Trust then the response and details are forwarded to the relevant MAT for consideration during their determination which is clearly stated in Admission Consultation information.

Screening Questions –		**Yes or No**
1	Use systematic and extensive profiling or automated decision-making to make significant decisions about people.	N
2	Process special category data	N
3	Process criminal offence data	N

4	Systematically monitor a publicly accessible place	N
5	Use new technologies, innovative technological or organisational solutions.	N
6	Use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity, or benefit.	N
7	Carry out profiling including evaluation or scoring	N
8	Process biometric or genetic data.	N
9	Combine, compare, or match data from multiple sources.	N
10	Process personal data without providing a privacy notice directly to the individual and/or other processing involving preventing data subjects from exercising a right or using a service or contract.	N
11	Process personal data in a way which involves tracking individuals' online or offline location or behaviour or other systematic monitoring	N
12	Process children's personal data for profiling or automated decision-making or for marketing purposes or offer online services directly to them.	N
13	Process personal data which could result in a risk of harm in the event of a data or information security breach.	Y
14	Any other processing that is large scale, involves profiling or monitoring, decides on access to services or opportunities, or involves sensitive data or vulnerable individuals.	N
15	Processing that may result in significant/high risks that cannot be reduced after taking any/all mitigating measures	N

If you have answered YES to any of the questions above, you must complete the full DPIA **in the next section** and return it to
information.governance@york.gov.uk

If you have answered **NO** to **ALL** questions, **you are not required to complete a full DPIA**. However, we must record all decision making regarding DPIA, so please send your completed screening questionnaire to
information.governance@york.gov.uk

Data Protection Impact Assessment (DPIA)

Reference Number (if applicable)	
Lead/contact name:	Rachelle White
Directorate:	Education & Skills
Service Area:	Inclusive Mainstream
Data controller details:	Rachelle White and Business Intelligence
Data processor details:	Rachelle White
Information Asset Owner: (All systems/assets must have an Information Asset Owner (IAO). Intranet	Information on the roles of SIRO, IAO, IAA, DPO and CG (york.gov.uk)	Rachelle White
Information Asset Administrator: (All systems / assets usually have an Information Asset Administrator (IAA) who reports the IAO as stated above. Intranet	Information on the roles of SIRO, IAO, IAA, DPO and CG (york.gov.uk)	Rachelle White
Customers and stakeholders: Please list all involved including both internal and external parties	Any consultations respondents Any Multi Academy Trust (MAT) for whom a response may be received and passed directly to them for consideration – the list of MATS are Yorkshire Learning Trust Pathfinder Multi Academy Trust Excel Learning Trust Heartwood Learning Trust Ebor Academy Trust TEAL Nicholas Postgate Catholic Trust

Step 1 – Identify the need for a DPIA

Hints and tips to complete this section:
See above DPIA screening questions

It was identified that a DPIA would be needed ***.

The purposes of the proposed, new or change in process, service, technology, or project are ****this could be copies of extracts from or links to project docs, business cases etc****
The above will realise several benefits including: *** e.g. what are the expected benefits for individuals/the council etc

See customers and stakeholders above and/or describe when and how you will seek individuals' views – or the reasons it's not appropriate to do so and/or refer to the equalities impact assessment Intranet | Equalities and human rights (york.gov.uk)

If you need to describe "purposes" because there are no other documents, consider the below points
- *what do you want to achieve*
- *what is the intended effect and/or outcome for individuals, the council etc*
- *are there any unintended effects and/or outcomes for individuals, the council etc*

To determine admission arrangements for 2027-2028 admissions following a consultation as required by School Admissions Code 2021 which is an annual process.

As part of the consultation, respondents can provide their response to the draft admission arrangements via an online surveymonkey which asks for the personal details (name, address, contact details, position (if applying for a school or MAT)) a response can be provided without these.

This information is collated by surveymonkey by Business Intelligence is then passed to the School Admission Manager for consideration as part of the consultation process.

The details of the respondent is not shared within the Admission Consultation report.

This information is kept securely within CYC folders with limited access to CYC staff only.

If a response is received regarding a Multi Academy Trust then the response and details are forwarded to the relevant MAT for consideration during their determination which is clearly stated in Admission Consultation information.

Step 2 – Describe the information flow

Hints and tips to complete this section:
The collection, use and deletion of information should be described here.
It may be useful to use a flow diagram or another visual way or data map/flow/list to explain information flows.

- Respondent completes a surveymonkey at School Admissions Consultation 2027 to 2028 – City of York Council which requests a respondents details (but a response can be provided without these details). Details requested are name, address, email address for parent/carers/interested parties. Details requested are name, address, email address, school and role for school/MAT responses.
- The information is collated by Business Intelligence via the surveymonkey.
- The information is passed to Rachelle White, School Admissions Manager.
- The information is stored on the CYC L drive with limited access
- If a respondent provides as response relating to a change to the admission arrangements of a MAT, Rachelle will forward the response and respondents details to the relevant MAT contact vis secure email.
- The response will be included in determination report but not the respondents details.

Provide details of personal, special category and criminal offence data being processed by checking all options that apply. Add any additional items and their description, in the 'other' option.			
Personal data			
Name	☒	NHS Number	☐
Address	☒	NI Number	☐
Post Code	☒	IP Address	☐
Date of Birth/Age/Age group	☐	Photograph	☐
Telephone Number(s)	☐	Email Address	☒
Other: Please describe	☒	If a school or MAT response their role and school is also requested	
Special Category Data			
Religion	☐	Ethnicity	☐
Health Information	☐	Trade Union Membership	☐
Political Opinions	☐	Sexual Orientation	☐
Biometric Data	☐	Criminal offence and/or history	☐
Other: Please describe e.g. Carer	☐		
Criminal offence data			
Please describe:			☐

Provide details of data subjects - checking all that apply. Add any additional items in the 'other' option.			
Residents	☐	Customers/Clients/Citizens	☐
Children/young people	☐	Vulnerable people/groups	☐
Staff/employees/agency staff	☐	Volunteers	☐
Other: Please describe	☐		

Step 3a – Identifying risks & solutions

The following questions will highlight any risks associated with the principles of the UK General Data Protection Legislation (UK GDPR) and Data Protection Act 2018 (DPA) and other privacy legislation

Where a risk is identified, it should be carried forward to the table in Step 3b below, where mitigation and evaluation should be recorded.

Data protection/ privacy Issue	Response	Risk (Yes/No)
Who is the IAO and IAA?	Rachelle White	
How many individuals will be affected	The number of respondents who provide a response. This is usually less than 10.	No
What is the nature of the relationship with the data subjects?	Surverymonkey respondents	No
How will information be collected and/or what is the source of the information?	Online surveymoney information provided by respondents	No
Who will have access to the information?	Rachelle White, School Admissions Manager, School Admissions Team, some members of the Inclusive Education Service area.	No
Is any information shared within CYC?	Business Intelligence to Rachelle White only	No
Is any information shared externally with other organisations?	If a response is regarding a Multi Academy Trust then the response and details are forwarded to the relevant MAT for consideration during their determination which is clearly stated in Admission Consultation information.	No

| What is the lawful basis for processing personal data? | *Article 6*

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
==**(c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).==
(d) Vital interests: the processing is necessary to protect someone's life.
==**(e) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.==
==**(f) Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)== | |
| What is the lawful basis for processing special categories of personal data | *Article 9*

(a) Explicit consent
(b) Employment, social security and social protection (if authorised by law) | |

	(c) Vital interests (d) Not-for-profit bodies (e) Made public by the data subject ==(f) Legal claims or judicial acts== ==(g) Reasons of substantial public interest (with a basis in law)== (h) Health or social care (with a basis in law) (i) Public health (with a basis in law) (j) Archiving, research and statistics (with a basis in law)	
What is the lawful basis for processing criminal conviction or offences including past criminal convictions or offences	*Article 10* *No*	
Will information be processed in a way that goes beyond an individual's reasonable expectations?	No	
Do we have any previous experience of this type of processing?	Yes	
How will you tell the individuals about the use of their information?	Privacy notice is included on the surverymonkey as well as confirmation that any MAT response will be forwarded to the relevant MAT for their consideration	
Does the privacy notice cover the processing activities, or does it need amending?	Yes included in the privacy notice	

If you are relying on consent to process personal information, how will this be collected and what will you do if it is not given or withdrawn?	If consent is withdrawn we can remove the response, advised the respondent that the response will not be considered in any determination. If the information has already been shared with a MAT we will advise them accordingly.	
Purpose Limitation		
Have you identified all the purposes at Step 1 for which you will use information?	Yes	
Does the processing achieve your purpose(s)?	Yes	
Is there another way to achieve the same outcome?	No a consultation is a legal requirement in the School Admissions Code 2021	
How will you ensure data minimisation i.e. only collecting/processing the minimum amount for the purpose(s)?	Minimal involvement of staff members (only BI and Rachelle White) Only essential information requested Information passed on to designed MAT contact only.	
How will you ensure there is no "function" or processing creep?	Set defined process with limited access to staff and no deviation from process	
Can you ensure that the data collected is good enough for the intended purpose?	Only relevant/necessary information requested (response can be provided without the information)	
Is there any information that could be removed or anonymised	No	

without compromising the purpose(s) set out at Step 1?		
Accuracy		
Can the information be amended and/or deleted if required?	Yes	
How will you ensure information used will be accurate and up to date?	Yes	
Have you established retention periods for the information?	Checked retention schedule with IG – no exact record type however will check the admissions code to see if it is noted in guidance.	
Does the new processing/system allow you to delete information in line with the retention periods?	Yes	
If there is a business need to retain information beyond the retention period, e.g. historical trend analysis, can the data be anonymised at this point?	No	
Have you checked if there is there a legal or other requirement to transfer the data at the end of the retention period for permanent preservation e.g. City or National Archives? If there is, how will this be done?	Not required	
How will it be destroyed/deleted or transferred?	Deleted from L drive no other copies held.	

Security		
If required, has the information security technical checks/questions been completed and approved by ICT/ICT security? OR has it identified any risks?	NA	
Where will the information be stored?	*CYC L drive in Admissions folder with limited access*	
Does the new or current system/ procedure/processing provide adequate protection against security risks?	Yes	
What is the current state of technology in this area and/or are there any relevant advances in technology or security?	Standard CYC security	
What training and guidance is or will be given to staff?	Information processed by Rachelle White not training required of other staff	
What data protection training has been undertaken by staff?	*All CYC staff are required to complete regular mandatory DP and information security training – MyLo*	
If a third party is being used, what is the data protection relationship e.g. independent controllers, joint controllers, controller / processor, or processor/controller?	NA	

If a third party is being used, is there a contract in place with the appropriate UK GDPR/DPA 2018 clauses and schedule if needed?	NA	
If a third party is being used, how have you checked that their processes are UK GDPR/DPA 2018 compliant?	*NA*	
Is the third party signed up to any approved code of conduct or certification scheme e.g.,	*NA*	
International Transfers		
Will you transfer information outside of the EEA?	No	
If transferring data outside of the EEA, does the country/ organisation demonstrate an adequate level of data protection?	No	
If transferring information outside of the EEA, how will you ensure that the information is transferred securely?	NA	
Will you be using 'Cloud Based' systems to store or transfer information? If so, where is the geographical location of the server and does the system demonstrate and adequate level of data protection?	No	

Rights of the Data Subject		
How will you manage rights of individuals requests e.g. Subject Access Requests (SARs), request to rectify data, request to be forgotten, objection to processing, restriction?	*CYC policies and procedures -* *information.governance@york.gov.uk* *If a SAR is requested this information would be included*	
Does the system involve automated decision making? If so, do you have a process in place to facilitate human intervention?	No	
Accountability		
As a result of this new or change to processing, do you need to update entries in the Information Asset Register (IAR)/ROPA etc?	No	
As a result of this new or change to processing, do you need to update any Policies or Procedures?	No	
As a result of this new or change to processing, do you need to consider any Codes of Practice, regulatory guidance etc?	No	

Step 3b – Identifying risks & solutions

What are the risks and mitigations about data processing?

Required information: privacy risks identified, mitigation/solution, evaluation (i.e. is the risk eliminated/reduced/accepted).

Treat this in the same way as defining project risks but look at it from a customer and data point of view. It is good practice to include the risks identified here in the project or service area risk register so that they are monitored throughout the lifecycle of the project and/or service provision.

Transfer any risks identified in Step 3a above into the below table, i.e. all those where Risk is Yes.

Risk	Mitigation / Solution(s)	Evaluation *Is the risk eliminated, reduced, or accepted?*
Personal/special categories data/criminal offence data transfer • *More than is necessary* • *Not accurate / up to date* • *Not by secure methods*	Only the minimum amount of information is being collected as part of the consultation Survey Monkey is an approved tool for CYC use – no ICT security issues.	*RA*
Individuals/data subjects are not	Privacy notice(s) to be reviewed/updated if required CYC policies and procedures for ROIs – information.governance@york.gov.uk	*RA*

informed or can access their rights	[Intranet | Data Protection, Privacy, and Information Governance (york.gov.uk)](#) [https://www.york.gov.uk/privacy/SchoolsServicesAdmissionsTransportAndAppeals](#)	
Data breaches: Personal information may be exposed, leading to identity theft or fraud, financial fraud, physical harm, or other forms of malicious use e.g.	risk of data breach is low: • CYC ICT data security and cybersecurity measures • Use of passwords and logins to system(s) • Carry out staff training • Service area(s) to review their DR/BCP plans to ensure any loss of access to systems/data is covered, are efficient, and effective	*RA*
Breach notification obligations to ICO/NHS etc: If a data breach occurs due to insufficient security, the organisation may fail to meet its obligation to promptly notify affected individuals and relevant authorities.	CYC policies and procedures in place for the reporting of data breaches to the ICO	*RA*
Information could be accessed or shared without individuals' consent, violating their right to privacy.	• CYC ICT, HR, information governance policies and procedures • Use of passwords and logins to system(s) • Carry out staff training	*RA*
Non-compliance with data protection and	• DPIA • DSA – covered in education general	*RA*

privacy legislation/regulations resulting in regulator action/sanctions including potential fines and legal action.	• Privacy notices to be drafted/ reviewed • Compliance monitoring e.g. through internal audits etc	
Improper system /records access	CYC organisational and technical measures such as • User designation, • user permissions limited based on access requirements for role	*RA*

Unlocked device with unauthorised access to system	CYC organisational and technical measures such as
	    • Standard work policy to lock device when leaving desk.
	    • Autolock
	    • Rolling password changes
		RA

Privacy notice does not reflect processing activity	Privacy notice has been reviewed and is already published on CYC website	*RA*
Retention periods are not adhered to	Query regarding retention period – ongoing	*RA*
IAR/ROPA is not up to date	IAR/ROPA will be updated to include all new and updated assets and new processing activities – JB to check IAR	*RA*
Policies and procedures do not reflect new project/new or change to processing	N/A	
Financial loss from breaches and subsequent legal action and/or	Insurance policies in place	

insurance claims from individuals could result in financial losses, including legal fees, fines, and compensation to affected individuals		
inability to access services or opportunities	No implications on school places	*RA*
loss of control over the use of information;	ICT security systems in place for securing the CYC network	

Some other examples of actions that can reduce risks are

- taking additional technological security measures; or using a different technology; training staff to ensure risks are anticipated and managed.
- anonymising or pseudonymising data where possible.
- writing internal guidance or processes to avoid risks.
- putting clear data-sharing agreements into place with all partners.
- offering individuals the chance to opt out where appropriate; or
- implementing new systems to help individuals to exercise their rights

Step 5 – Record of outcomes and sign off

Please complete the sign off section below and email a copy of the full document to information.governance@york.gov.uk Where it is identified that the processing is likely to result in a high risk to individuals, approval will need to be gained from the Senior Information Risk Owner and/or Chief Operating Officer and/or the Information Commissioner's Office. Please see Do we need to consult the ICO? | ICO

	Yes/No	Date	Name	Position
Confirm ongoing or outstanding actions will be integrated to the project or service plan with date and name and position of who responsible				
Residual risks approved:				
DPO/Information Governance advice provided:				
Summary of DPO/ Information Governance advice: Privacy notice in place to cover the consultation, DSA in place with MATs for any information shared. Only remaining query is regarding the retention period for the records. RW to check schools admissions code and ask regional groups.				
DPO/Information Governance advice accepted.				
If not accepted, please explain the reasons:				

Project/Process Sponsor	
Name	Rachelle White
Job Title	School Admissions Manager
Signature	
Date	13/11/2025

Information Asset Owner	
Name	Rachelle White
Job Title	School Admissions Manager
Signature	
Date	13/11/2025

Data protection/information governance	
Name	James Bailey
Job Title	IG Adviser
Signature	
Date	13/11/2025