

## Data Protection Full Assessment Impact Assessment Id: #237

### 1.0 Screening Information

**Project Name**

New Worcester City Secondary School

**Name of Project Sponsor**

Sarah Wilkins

**Name of Project Manager**

Lucy Langdon

**Name of Project Lead**

Sarah Wilkins

**Please give a brief description of the project**

Delivery of a new secondary school on site at Newtown Road to meet the needs of Worcester City families and allow us to provide a 5% surplus across the Education Planning Area.

**Data Protection screening result**

Will require a full impact assessment

**Equality and Public Health screening result**

Will require a full impact assessment

**Environmental Sustainability screening result**

Will require a full impact assessment

### 1.1 Background and Purpose

**Background and Purpose of Project?**

To support your answer to this question, you can upload a copy of the project's Business Case or similar document. The provision of places for secondary school pupils in the Worcester City Education Planning Area is the key mainstream sufficiency risk in Worcestershire over the next five years. Mitigating this risk is necessary to meet our statutory and strategic aims over the next five years.

We have seen that the number of children seeking a year seven place in Worcester City has been consistently increasing over the last decade. The population of Worcester continues to grow, with increasing cohort numbers due to enter year seven over the next six years, as well as substantial housing planned for the City and surrounding area as part of the South Worcestershire Development Plan. In Autumn 2020 there were fewer than 10 spare places in year seven across the City, which represents a 0.7% surplus.

Across any Education Planning Area in Worcestershire we seek to maintain a 5% surplus of places. This is an important factor to meeting the strategic aims as outlined in the Worcestershire Education and Skills Strategy (2019 – 2024) and ensures:

- Families have an element of choice and increase the likelihood that families receive one of their top two preferences;
- all children who move into the City during the school year are offered provision within 20 days; and
- all children who want to access a place in their local community are able to do so, reducing school travel times.

The oversubscription criteria of schools favour pupils living closest to the school when oversubscribed from in-catchment or feeder schools. Therefore, schools on the outskirts of Worcester City are disproportionately affected by this strain, notably children living within Warndon Villages, Warndon, Claines, and looking into the future, those families moving onto housing developments on the outskirts of the City. We have seen a year on year decline in pupils at schools in these areas receiving an offer for their preference secondary school.

The growth of housing in the City will be particularly focused on the South and South East, which is supported by two secondary schools; Nunnery Wood High and Blessed Edward Oldcorne Catholic. The rise in population in this region is expected to continue with significant housing developments approved in the South Worcester Urban Expansion land allocation. Provision in the South is currently below forecast need for the next five years, with demand approximately four forms of entry (120 places) higher than these two secondary schools can currently support.

The level of additional places required provides us with an opportunity to deliver a new secondary school to meet short-term and long-term growth of Worcester City.

The provision of a new Secondary School in the City would meet the sufficiency needs of Worcester and allow us to provide a 5% surplus across the Education Planning Area.

The provision of a new Secondary School to meet this need was approved by Cabinet on 4th February 2021.

This project aligns to the Council's requirement to:

- The Local Authority's statutory requirements to provide a sufficiency of school places;
- The ability of the Worcestershire County Council to meet the aims agreed within the Education and Skills Strategy
- Providing local schools which can be accessed by active travel routes is key to the Council's core priorities of 'Protecting the Environment' as set out in our Corporate Plan 'Shaping Worcestershire's Future 2017 to 2022

### Upload Business Case or Support documents

No files uploaded

### Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

The project output will be a new 4FE secondary school in Worcester City with a mainstream autism base and sports facilities available for use by the community. This will be delivered via a number of workstreams:

- Land, procurement and delivery - acquisition of suitable land and construction
- Education - Academy Sponsor selection and consideration of educational requirements of the school (e.g. inclusivity)
- Communication and engagement - stakeholder management and consultation
- Legal
- Mitigating school places - ensuring sufficiency of school places in Worcester

### Project Outcomes

Briefly summarise what the project will achieve.

- Sufficiency of school places for all secondary age pupils in Worcester City
- A reduction in travel times and car use for secondary age pupils travelling to school
- Certainty that all pupils in Worcester City can attend a secondary school in their community
- Longevity of secondary school sufficiency in Worcester in line with housing growth
- Increase in jobs for school staff in Worcester
- Increased inclusivity for pupils with autism

### Is the project a new function/service or does it relate to an existing Council function/service?

Existing

### Was consultation carried out on this project?

No

## 1.2 Responsibility

### Directorate/Organisation

Worcestershire Children First

### Service Area

Education and Early Help

## 1.4 Specifics

### Project Reference (if known)

Not Recorded

### Intended Project Close Date \*

September 2025

## 1.5 Project Part of a Strategic Programme

Is this project part of a strategic programme?

No

## 2.0 Personal Data

**Who are you processing data about?**

Customers, clients or service users

Suppliers

Staff, persons contracted to provide a service

Professional advisers and consultants

Students and pupils

**What personal data will be collected? \***

The second stage is to list all of the types of personal data that you believe the project/works/additional processing will utilise.

Please select yes for as many examples of types of data that are relevant and include any others in the free text at the bottom of the page.

**Basic Identifiers:**

**Name**

Yes

**Date of Birth**

No

**Age**

Yes

**Gender**

No

**Sex**

No

**Contact Details:**

**Address**

Yes

**Email Address**

Yes

**Home Phone Number**

Yes

**Mobile Phone Number**

Yes

**Postcode**

Yes

**ID Number:**

**National Insurance Number**

No

**Driving Licence/Number**

No

**NHS Number**

No

**Other General Identifier**

No

**Employment:**

**Work Related Training/Awards**

Yes

**Financial:**

**Income/Financial/Tax Situation**

No

**Appearance:**

**Photograph**

No

**Physical Description**

No

**Lifestyle:**

**Living Habits**

No

**Marital Status**

No

**Technology:**

**Login/Username**

No

**Device MAC Address (Wireless Network Interface)**

No

**Device Mobile Phone/Device IMEI No**

No

**Location Data (Travel/GDPS/GSM Data)**

No

**Online Identifier e.g. IP Address**

No

**Website Cookies**

No

**Other Data Types Collected**

Not Recorded

## 2.1 Legal basis for Personal Data

### What is your lawful basis for processing the personal data? \*

Please choose one of the following

Data Subject's consent for the purpose

No

Necessary for a contract with the Data Subject

Yes

Necessary to comply with a legal obligation

No

Necessary to protect the vital interests of an individual(s)

No

Necessary for a task in the public interest or exercise of official authority of Controller

Yes

Necessary for legitimate interests of Controller unless interests are overridden by the interests or rights of the individual (only available in limited circumstances to public bodies)

No

## 2.2 Special Data

### What special category personal data (if any) will be collected? \*

This section will not apply to all projects and should only be completed if it applies to you.

It is important that you read this section carefully, as these data types require additional care and protection.

If you do pick anything from this list, you will be required to give more details in Section 4 of this form.

You can read more about Special Category Data through this link;

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

#### Race

No

#### Ethnic origin

No

#### Political opinions

No

#### Religion

No

#### Philosophical beliefs

No

#### Trade union membership

No

#### Genetic Data

No

#### Biometric Data

No

#### Sex life

No

#### Health or social care

No

## 2.3 Legal basis for Special Data

### What is the relevant condition for processing the special category personal data? \*

You must qualify under one of the below exemptions as well as having a legal basis from the previous question.

#### Explicit Consent

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

Not Recorded

#### Employment and Social Security

Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

Not Recorded

#### Vital Interests

Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

Not Recorded

#### Legitimate Interests of:

**"a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim".**

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

**Note – this is not often applicable to local authorities.**

Not Recorded

#### Publicly Available Data

Processing relates to personal data which are manifestly made public by the data subject;

Not Recorded

#### Legal or Court Proceedings

Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

Not Recorded

#### Public Interest - Statutory Necessity

Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

Not Recorded

#### Medical, Health and Social Care Provision

Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

Not Recorded

#### Public Health

Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

Not Recorded

#### Archiving or Scientific, Historical or Statistical Research Purposes

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

## 2.4 Information Involved

Understanding the information flows involved in a project is essential to a proper assessment of privacy risks.

### How will the data be collected? \*

This section should be filled in for every project, not just those collecting Special Category data.

Date for consultants will be collected through normal procurement processes.

Public data will be collected through public consultation.

### What will the data be used for? \*

This section should be filled in for every project, not just those collecting Special Category data.

Consultation data will be used for informing us about what is important to residents in the delivery of a new school, etc.

We will collect postcode data to ensure we have a good spread of respondents across Worcester.

### Has data already been collected?

Yes

### Are the purposes for which you are collecting the data different? \*

If the data you are hoping to use was not collected specifically for this project, please explain in the box below why it was collected. This will include data that you have collected from other teams within WCC.

No

### Explain why existing and/or less intrusive processes or measures would be inadequate \*

In this section, you should explain why your new method/project is absolutely necessary and show that you have thought about all other options.

We want to ensure we receive a wide spread of views so that we deliver an adequate service for everyone in Worcestershire.

## 3.0 Other organisations

### Are other organisations involved in processing the data?

No

## 3.1 Storage detail

### How will the information be stored? \*

Please include details of whether data will be stored outside of the European Economic Area (EEA).

Please remember that cloud storage and back up servers maybe outside the EEA.

Information will be stored on WCC servers (U Drive & SharePoint).

### For how long will the data be retained? \*

Consultation responses will be disposed of 6 years following end of business use (i.e. 6 years from school opening).

### What is the deletion process? \*

Manual

## 4 Consultation details

Consultation can be used at any stage of the DPIA process and is important to allow people to highlight privacy risks and solutions based on their own area of interest or expertise.

For further assistance and information please visit the [consultation toolkit section on Ourspace](#).

### Explain what practical steps you are going to take to ensure that you identify and address privacy risks \*

- Collecting anonymised data wherever possible
- Holding data securely
- Explain via privacy notice what we are doing with people's data
- Voluntary responses

### Who should be consulted, internally and externally? Do you need to seek the views of members of the public? \*

Members of the public

### How will you carry out the consultation? \*

(You should link this to the relevant stages of your project management process)

- Website
- Face-to-face event/drop-in
- Might have physical copies

## 5 Risk register

At this stage you should identify the possible privacy risks together with their likelihood, severity and overall level, and for high risks the measures taken to reduce the risk.

Add any risk to the relevant sections below.

### Fair and Lawful Processing

Data must be processed lawfully, fairly and in a transparent manner.

Please also consider

- Have you identified at least one lawful basis for the personal data processed as part of the project?
- Does at least one Controller involved have a lawful power to act?
- Do you need to create or amend a privacy notice?
- How is your processing going to be transparent?

### Risk that processing is not transparent, and individuals are unaware that data is being collected or why it is processed

#### Unmitigated Risk

Likelihood - Reasonably Unlikely

Severity - Minimal Impact

Score - Low

#### Mitigation/Solution

We have identified a lawful basis and will supply a privacy notice

#### Mitigated Risk

No Risk

#### Result

Eliminated

### Risk that information is being processed unlawfully

No Risk

### Specific, explicit and legitimate purposes

The purpose for which you process personal data must be specified, explicit and legitimate. Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected.

Please also consider

- Does your project plan cover all of the purposes for processing personal data? If not your plan needs amending accordingly.

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- Are all elements of the processing compatible with the original reason and justification for the processing?
- What are these specific, explicit and legitimate purposes?

#### **Risk of 'mission creep' and information is used for different, or incompatible purposes to that identified when originally collected**

##### **Unmitigated Risk**

Likelihood - Likely  
Severity - Some Impact  
Score - High

##### **Mitigation/Solution**

Not giving information to anyone else for a purpose  
Access controls in place  
Including in privacy notice reasons why someone else might want to use this information

##### **Mitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

##### **Result**

Reduced

#### **Adequate, relevant and not excessive**

Personal data processed must be adequate, relevant and not excessive in relation to the purpose for which it is processed. Please also consider

- Is the quality of the information adequate for the purposes it is used?
- If not, how is this to be addressed?
- Are measures in place to ensure that data is limited to that which is needed to fulfill the aim of the processing?
- Which personal data elements do not need to be included without compromising the needs of the project?

#### **Risk of loss of control over the use of personal data**

##### **Unmitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

##### **Mitigation/Solution**

Project management steps in place

##### **Mitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

##### **Result**

Reduced

#### **Risk that inadequate data quality means the information is not fit for the identified purpose(s) potentially leading to inaccurate decision making**

##### **Unmitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

##### **Mitigation/Solution**

Comparing data sets to ensure they match up

##### **Mitigated Risk**

No Risk

##### **Result**

Eliminated

#### **Risk that any new surveillance methods may be an unjustified intrusion on individuals' privacy**

No Risk

## Accurate and timely

Personal data processed must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.

Please also consider

- If you are procuring new software does it allow you to amend data when necessary?
- How are you ensuring that personal data obtained from individuals or other organisations is accurate?
- Do you have processes in place to keep data up to date?
- If any data sets are to be merged, what checks are carried out to ensure that the right data records are matched/merged together?

### Any data matching or linking, including whole data sets may link wrong records together

No Risk

## Storage limitation

Personal data must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data.

Please also consider

- What are the risks associated with how long data is retained and how they might be mitigated?
- Has a review, retention and disposal (RRD) policy been established?
- How does the software enable you to easily act on retention criteria – does it enable bulk review/destruction; set review periods; extract for long-term preservation/retention of the corporate memory?

### Risk information is retained for the wrong length of time (both too long and too short)

#### Unmitigated Risk

Likelihood - Likely

Severity - Some Impact

Score - High

#### Mitigation/Solution

Putting a retention period in and recording it on the retention schedule

#### Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

#### Result

Reduced

### Risk information is not securely destroyed when its retention period has been reached

No Risk

## Security

Personal data must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, “appropriate security” includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Please also consider

- What technical and organisational measures are in place to ensure that the data is protected to an adequate level?
- What training on data protection and/or information sharing has been undertaken by relevant staff?
- What access controls are in place to enforce the ‘need to know’ principle?
- What assurance frameworks are utilised to assess adequacy of security measures in place e.g. NHS DSPT; Cyber Essentials Plus; PSN Certification?

### Risk of loss of confidentiality

No Risk

### Risk of inadequate security controls in place to protect and secure personal data, including inappropriate access

#### Unmitigated Risk

Likelihood - Likely

Severity - Some Impact

Score - High

**Mitigation/Solution**

The Council's security measures and access controls are in place

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Reduced

**Risk that workers processing the data are not aware of their data responsibilities**

**Unmitigated Risk**

Likelihood - Likely

Severity - Some Impact

Score - High

**Mitigation/Solution**

Everyone has data protection training

Risk assessment

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Reduced

**Risk that information is distributed using inappropriate methods**

No Risk

**Risk of re-identification of pseudonymized or anonymised data (e.g. collecting matching and linking identifiers and information may result in information that is no longer safely anonymised)**

No Risk

**Risk that information is transferred to a 'third country' without adequate safeguards**

No Risk

**Financial and reputational**

**Risk of identity theft or fraud**

No Risk

**Risk of financial loss for individuals or other third parties**

No Risk

**Risk of financial loss for the Council (including ICO fines)**

No Risk

**Risk of reputational damage to the Council, partners, and processors**

No Risk

**Health, safety and wellbeing**

**Risk of physical harm to individuals**

No Risk

**Risk of physical harm to staff and workers**

No Risk

**Risk of discrimination**

No Risk

**Risk of other significant economic or social disadvantage**

No Risk

**Individuals Rights**

Data protection legislation gives data subjects' various rights (listed below). Limiting or restricting any of these rights is likely to be a significant impact so the justification for any restriction, as well as mitigations, must be fully outlined.

**Inability to meet individuals' right to be informed****Unmitigated Risk**

Likelihood - Likely  
Severity - Some Impact  
Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

**Result**

Reduced

**Inability to meet individuals' right of access****Unmitigated Risk**

Likelihood - Likely  
Severity - Some Impact  
Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

**Result**

Reduced

**Inability to meet individuals' right to rectify inaccurate data****Unmitigated Risk**

Likelihood - Likely  
Severity - Some Impact  
Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact  
Score - Low

**Result**

Reduced

**Inability to meet individuals' right to erase data****Unmitigated Risk**

Likelihood - Likely  
Severity - Some Impact  
Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely  
Severity - Minimal Impact

Score - Low

**Result**

Reduced

**Inability to meet individuals' right to restrict processing**

**Unmitigated Risk**

Likelihood - Likely

Severity - Some Impact

Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Reduced

**Inability to meet individuals' right to data portability**

**Unmitigated Risk**

Likelihood - Likely

Severity - Some Impact

Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Reduced

**Inability to meet individuals' right to object**

**Unmitigated Risk**

Likelihood - Likely

Severity - Some Impact

Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Reduced

**Inability to meet individuals' rights relating to automated decision making and profiling**

**Unmitigated Risk**

Likelihood - Likely

Severity - Some Impact

Score - High

**Mitigation/Solution**

Data protection rights requests process by corporate information governance team

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Reduced

## Additional project specific risks

No additional risks recorded

## 6 Declaration

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate \*

Selected

I confirm that I will make sure that data protection has been and continues to be considered throughout the project life cycle and should circumstances change in the project to include any processing of personal data a further Data Protection Impact Assessment Screening will be carried out \*

Selected