



Department  
for Education

# **School attendance data collection impact assessment**

## **State Funded Schools**

**January 2024**

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# 1.Introduction

What is **in scope** of this Data Protection Impact Assessment (DPIA) is limited to the daily attendance data collection for maintained schools, Local Authorities (LAs ) and Academy Trusts. It is a change in frequency and method of collection for existing data collections (Census & Statutory Returns). It covers only those processing activities where the Department for Education is the data controller. To comply with our ongoing accountability obligation in accordance with Legislative requirements.

What is **out of scope** of this DPIA is any processing activity carried out by the School, LA or Academy Trust as the data controller necessary for them to comply with their ongoing accountability obligation in accordance with legislative requirements.

In July 2020, The Children’s Commission published a report detailing that 120,000 teenagers (approximately 1 in 25) were at risk at falling through the gaps of education and social care (Source – [Coronavirus crisis could see a lost generation of vulnerable teenagers falling through gaps in the school and social care systems | Children’s Commissioner for England \(childrenscommissioner.gov.uk\)](#) ). The information was provided by individual LAs directly to the Children’s Commissioner with no input from the DfE.

DfE at the time, only collected attendance data and vulnerable child data fields on a termly/annual basis in the following census collections:

- School Census
- Child in Need Census
- SSDA903 collection for “child looked after”.
- SEN2 Statutory Collection

The publishing of the Census data termly/annually did not give enough data for DfE to make timely interventions to reduce persistent absence and support vulnerable children. The School Census only gave a termly view, whereas the remaining three collections (above) were annual. This meant no daily trend data was available, meaning schools or DfE were unable to understand fully patterns, risks and issues for attendance. Additionally, there was a time lag to process the data when received by DfE before it could be published,

which meant operational decisions were made on data that was out of date.

By changing the frequency (daily) and method (automating) of the collection, DfE can support schools in understanding their own attendance patterns by providing their pupil level data in a daily report. The relevant LA/Academy Trust will receive pupil level data for the schools they are responsible for (who have agreed to share their daily data). Having daily reports enables DfE to provide additional timely support to schools/LAs and Academy Trusts.

It is important to note that where schools participate in the programme this does not replace Census Collections.

## **Synopsis of Programme**

To inform operational and policy decisions throughout the pandemic, DfE needed to understand attendance on a more frequent basis, resulting in the move to daily collections in March 2020. This was a major change for the sector and required the development of a bespoke, manual, voluntary data collection known as the Educational Settings (EDSET) form.

This new daily functionality proved invaluable, with the data provided helping to shape the government's response to the pandemic and offering new insights into the attendance pattern of pupils.

The use of daily attendance data during the pandemic showed that there was an opportunity to improve data flows between DfE, schools, LAs and Academy Trusts and opened the way to more timely data being collected.

As the school system recovered from the impact of Covid, it was vital that children attended school and continued their learning to achieve the best possible outcomes they can. The Children's Commissioner, Ofsted and Office for Health Improvement and Disparities highlighted the disproportionate impact COVID had on vulnerable children, including mental health and the increased risks of self-harm. See links:

- [Education recovery in schools: autumn 2021 – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/education-recovery-in-schools-autumn-2021)
- [Children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/children-and-young-people)

- [Damage to children's mental health caused by Covid crisis could last for years without a large-scale increase for children's mental health services | Children's Commissioner for England \(childrenscommissioner.gov.uk\)](#)

Applying the lessons learnt from the pandemic informed DfE's approach to automating the collection of attendance data daily. Schools, LAs and Academy Trusts dealt with unprecedented challenges. We do, however know termly, or even weekly absence data collection does not enable the level of analysis required to support schools, LAs and Academy Trusts in identifying trends, risks and issues requiring immediate action to support children they are responsible for.

To be able to collect daily attendance data DfE procured Wonde who asked schools to agree to share their daily attendance data with DfE. Once agreement has been given the school does not have to take any further action, Wonde connect to their management information system daily, extract the data and share it with DfE.

This is not a new data collection but a change in frequency of an existing collection. The data fields (including special category) are all currently collected via Census collections on a termly or annual basis depending on which collection it is. Schools, LAs and Academy Trusts have been engaged with this work from the outset, seeing the value in increasing the collection frequency to daily and although this agreement to share their daily data with DfE is voluntary we have so far got agreement circa 18,000 schools.

The daily data gives schools, LAs and Academy Trusts a much richer data set, helping them to understand any trends and potential risks and issues from a pupil's attendance pattern. This rich intelligence informs decisions and actions to respond to persistent absence in a timely way but could also identify potential safeguarding issues to be investigated and support/intervention plans developed at the earliest possible stage to prevent children from being at risk of harm. As part of the development of the products for schools, LAs and Academy Trusts, DfE carries out in-depth user research on a regular basis.

This change of frequency (daily) and method of collection (automated) does not require schools, LAs and Academy Trusts to do anything in addition to their current attendance data collection. Choosing to share attendance data daily with DfE is voluntary, schools choose whether to sign up and in doing so agree to Wonde processing this data and sharing with DfE. This is explained in the information for schools, so they understand

what they are agreeing to and specifically to sharing this data with DfE via Wonde. This information supports an electronic data sharing agreement on the Wonde portal.

## **The personal data items we will be processing**

### **Demographics**

Surname, forename, Date of Birth, sex, ethnicity, (ethnicity is special category data)

Unique pupil number, school unique reference number, local authority code as collected in the School Census.

All attendance codes as published on Gov.Uk

### **Vulnerable Child Indicators**

Child In Need, Child Protection Plan, Looked after Child, Previously Looked after Child, SEN support, Education Health and Care Plan (EHCP), Free school meals.

This is an existing data collection; it changes the method of collection to be automated and frequency to daily collection for data currently being collected via a different frequency and method:

Child in Need and Child Protection Plans are collected annually in the CiN Census

Child looked after; child previously looked after – annually collected via Local Authorities in the SSDA903 return.

SEN support, education health and care plan, free school meals– collected in the termly school census data collection. (Special category data) in the SEN2 Statutory Collection

## **2. 2a Lawful basis for processing personal data**

The legislation enabling schools to share this data is section 3, 4 or 5 of the Education (Information About Individual Pupils) (England) Regulations 2013, and Section 537A Education Act 1996. The Education (Pupil Information) (England) (Miscellaneous Amendments) Regulations 2016

As a government department, DfE are granted the powers of Article 6(1)(e) as we are “exercising a function” via the census collections. For this collection we are exercising

multiple functions which are all supported via the census collections are legislated via the Education Act 1996 section 10 and section 11 which require the Secretary of State to “promote the well-being of Children in England” and “exercise his powers with a view to (among other things) improving standards, encouraging diversity and increasing opportunities of choice.”

The changes to frequency and method are designed to improve education for pupils and therefore are consistent with the duty on the SoS to promote the education of children in England.

### **3. Is a data processor being used?**

DfE are using a data processor (Wonde) to extract and share this data. When schools have given their agreement to share the data daily, Wonde is working under the terms of a DfE contract to collect the data from the school Management Information System and securely transfer it to DfE daily. The contractual arrangements between DfE and Wonde complies with the requirements for processor contracts under Article 28.

This collection is done using a standard interface that allows pupil level data to be shared securely. Under the contract, Wonde can only collect the data that DfE has said they can collect, and they can only transfer it to DfE in the agreed way.

- Wonde already had established working relationships with schools and Academy Trusts and are trusted by over 19,000 schools to process pupil data as the schools contracted data processor.
- Using a secure portal Wonde ask the school to give agreement to share their data with DfE daily via the automated transfer. The process is quick and simple, all schools need to do is click ‘yes’ if they want to give agreement. This is a one-off process once the school agrees to share data in this way it is automatically extracted from their Management Information System and sent to DfE each day.
- Schools can revoke agreement at any time should they wish to do so.
- For schools that have already given agreement to share their data, they have been asked to review and agree to agree to comply with the new Data Sharing Agreement (DSA).

- For schools giving agreement for the first time, a Data Sharing Agreement (DSA) is hosted on the Wonde portal for schools to review and agree to comply with when they agree to share their data.
- There is regular communications with schools, LAs and Academy Trusts to keep them up to date with any changes to this collection and request they review and agree the DSA to ensure ongoing agreement to share their data is given.

This is not a new data collection. The data Wonde will extract under the terms of the contract with DfE is already processed by DfE through the termly school census which schools have a statutory obligation to complete, and annual census collections, Child in Need Census, SSSA903 and SEN2 Statutory Collection. This collection changes the frequency (to daily from termly/annually) and the method from using DfE's COLLECT data base to the data being extracted with the school's agreement by Wonde from their Management Information System.

#### **4. How the data will be obtained**

The data collected is recorded in the school management information systems (MIS). DfE have provided schools, LAs and Academy Trusts with information to explain:

- taking part is voluntary but does not negate the need for the census.
- the nature of the relationship between DfE and Wonde (i.e., DfE is the controller and Wonde the processor working under contract).
- that this is not a new data collection but a change in frequency and method of an existing data collection and existing data share between the school/Academy Trust and DfE
- if they wish to participate, they need give agreement on Wonde's portal to confirm that they want to take part and that they agree to this data share via Wonde with DfE daily.

Wonde ask schools via a secure portal to give agreement for them to share their data with the DfE. Once this agreement is received Wonde connects to the MIS to extract the data as set out in the spec (detailed above).

Wonde transfer this data to DfE daily. It is important to note that DfE are not collecting



any new data, this reflects the school census, CiN Census, SSDA902 and SEN2 collections. The change is to the frequency which is daily compared to termly/annual as part of census.

The technical detail for this is as follows:

Data is collected from the 3<sup>rd</sup> Party Aggregator via their API interface and landed in the Data Directorates Transient Zone, where it is scanned for vulnerabilities before being made available for use.

## **5. What security measures are in place?**

DfE has robust safeguards and controls in place to ensure this data, as with all our data, is handled securely and in accordance with relevant data protection regulations. This data collection has been allocated an information asset owner responsible for controlling access to the data to only those with a justified and legal need and is responsible for completing ongoing periodic reviews to ensure that the data is retained for no longer than necessary for the purposes for which it was originally collected.

DfE has received the required Offshoring Approval for using Microsoft Azure from the departmental SIRO.

The project team worked with the DfE lead security information officer to ensure security colleagues are satisfied that the requirements of Article 32 are met, and this includes the secure hub used by Wonde. Security colleagues confirmed this meets DfE security requirements and complies with the requirements of Article 32 before DfE signed the contract.

All access to the data is authenticated via an Identity and Access Management solution (controlled by DfE). Authorisation to see data is controlled via role-based access rules.

## **6. Who will be involved in the processing of personal data?**

This DPIA covers DfE's processing activities as an independent data controller for the school attendance data collection. This data collection requires the exchange of data between several independent controllers.

Schools and Academy Trusts are independent data controllers for the initial data collection as required in law for the School Census Data Collection.

DfE becomes an independent data controller at the point they receive the attendance data collection via the secure hub. DfE has determined the purpose and means of processing for this data collection.

LAs as the accountable body (and independent data controller) for maintained schools and all children educated within their boundary (or placed in care out of Authority) for safeguarding purposes.

Data flows from DfE to the other independent controllers using View your Education Data (VYED) tool (see section 10 for more information).

DfE as the independent controller - Wonde is acting as DfE's data processor in accordance with the terms of their contract with DfE. All data collected is stored in Wonde's secure hub.

Wonde has satisfied the terms of our contract with regard to our security requirements.

No data will be collected without the agreement from the school in compliance with the data fields outlined in Section 2 (detailed in the contract). Data sharing agreements are in place with participating schools, this is a data controller to data controller data share (including the sharing of data from DfE back to the school/Academy Trust or LA via View Your Education Data).

DfE has a contract with Wonde that confirms DfE is the data controller and Wonde the data processor working under contract on DfE instructions. This contract complies with the requirements for contracts under Article 28. DfE have seen a copy of the penetration test conducted by Wonde and confirmed that it is compliant with DfE security requirements.

Wonde is DfE's data processor in accordance with the terms of the contract with DfE. All data collected is stored in Wonde's secure hub.

Wonde has satisfied the terms of DfE's contract about security requirements.

DfE access will be managed through tokens from Wonde. The token provides access permission for DfE to data held by Wonde. It is generated in Wonde's secure portal. The

token contains a code that DfE use when retrieving data from Wonde. These access tokens will be tightly managed, and keys need to be changed on a periodic basis (3 months) OR when someone in an operations/support leaves who has had direct access to the token information.

## 7. Retention period

Due to unprecedented challenges children, schools, LAs and Academy Trusts face, the data will need to be kept to enable long term analysis. For example, the effects of COVID and long COVID are, as yet unknown and will need to be kept under review as it is likely to have a long-term impact on the education of children. Additionally, DfE need to be able to monitor the impact of policy throughout a child's school life and into employment. The retention period for this data is state retirement age + 3 years (currently 67 years +3). This timeframe been chosen to allow DfE to link our education data to earnings and employment data across an individual's full economic lifetime (working career) for the purpose of longitudinal research. This retention period matches the National Pupil Database (NPD) data retention period.

The below list gives some examples of how the daily attendance data can be used for long term analysis, (this is not an exhaustive list)

- the effects of COVID and long COVID are, as yet unknown and will need to be kept under review as it is likely to have a long-term impact on the education of children.
- link patterns of attendance and education data to attainment, earnings and employment data
- to understand the long-term impact of patterns of attendance on different groups of children and their long-term outcomes
- obtain a detailed understanding of the use of exclusions by schools, including attendance post-suspension, and their long-term impact on attainment.

This collection will reflect DfE policy which is to pseudonymise which is a technique to replace, remove or transform information that identifies individuals, and keep that identifiable information separate. This enables this data set to be matched with other sets for analysis and research purposes.

As part of the ongoing reviews, consideration is given as to whether the data needs to be kept for longer and, if so, whether it will be possible to fully anonymise or de-identify the data. Any decisions taken in relation to anonymisation or pseudonymisation of the data, this DPIA will be updated with details of processes applied to ensure any risks of re-identification are considered and mitigated.

During the retention period, the data is subject to robust safeguards and controls to ensure this data, as with all DfE data, is managed securely and in accordance with relevant data protection regulations.

In accordance with the Information Asset Register and Ownership policy, during the retention period, the data will be subject to:

- Annual review (minimum) to ensure data is not kept unnecessarily.
- Pseudonymisation or anonymisation as appropriate

Access to identifiable data by DfE analysts, developers, testers and software engineers is tightly managed via rights-based access controls with access to directly identifiable data restricted to only those members of staff who have a justifiable and lawful business need to access identifiable data.

DfE are currently considering at what stage pseudonymisation will be carried out – an update to this DPIA will be made when this has been determined.

All deletions are managed by the schools as the Data Controller for the school attendance registers at source in their MIS system. The only deletions DfE will need to make is for any records which have been identified as incorrect, these are reviewed upon receipt of notification and deleted as required.

Where it has been decided that the data is no longer required and can be deleted/destroyed, the data will be destroyed in line with DfE practices employing a process of “secure sanitisation”, required under “Information Assurance Standard No. 5 – Secure Sanitisation” (“IS5”) issued by the former National Technical Authority for Information Assurance (CESG), now National Cyber Security Centre (NCSC).

Where internal reviews indicate that data is no longer needed, the data will be disposed of securely. Current DfE policy is that data is destroyed in line with DfE practices

employing a process of “secure sanitisation,” required under “Information Assurance Standard No. 5 – Secure Sanitisation” (“IS5”) issued by the former National Technical Authority for Information Assurance (CESG), now National Cyber Security Centre (NCSC). Further information on this process is available from the NCSC at this [link](#).

As a government department, DfE are sometimes, on rare occasions, subject to temporary restrictions which prevent the deletion of data during inquiries or investigations, such as the Independent Inquiry into Child Sex Abuse. If this data was to be subject to such request, the department would update the privacy notice to inform data subjects of such a change.

## **8. Processing data outside of the United Kingdom**

Wonde stores school data within Amazon Web Services data centre in Ireland. This ensures data is stored in EEA and can be freely transferred between Ireland and the UK under the current UK/EU GDPR adequacy decision.

This has been reviewed by Neil McIvor, Chief Data Officer as part of the DfE off shoring approval process and approval has been given.

Within DfE, data is stored and processed within Microsoft Azure cloud hosting which is based in the Republic of Ireland and the Netherlands. DfEs use of Microsoft Azure hosting has approval from the Cabinet Office and meet all the relevant guidelines for holding and processing personal and restricted data. This includes ensuring the systems comply with the Data Protection Legislation and other relevant legislative obligations that apply to data rated at OFFICIAL-SENSITIVE.

## **9. Are cookies or similar technologies used?**

No cookies are being used.

## **About necessity, proportionality, lawfulness and data quality**

## **10. The context of processing personal data**

As set out in the data collection principles document, DfE will use personal data to:

- identify national, regional and local trends and patterns of school attendance.
- inform policy thinking across the department.
- monitor and evaluate the delivery of programmes
- explore if it is possible to gain additional policy insight by linking it to other data sources within DfE.
- signpost to resources and offer support to schools, Academy Trusts and LAs to improve attendance.
- identify and share good practice.

Schools, Local Authorities, Academy Trusts and DfE will have more timely personal data to:

- Enable earlier trend analysis and identification of issues enabling significantly speedier intervention
- Reduce persistent absence, identify trends, better able to support vulnerable children.
- Better inform safeguarding intervention, to protect children from harm.
- Inform any support and interventions a child needs to enable them to be in school and help them achieve the best possible outcomes they can.
- Inform operational and strategic decision/policy making.
- Support budgetary/funding decisions by identifying where money needs to be spent.
- Able to identify trends where investment may be needed.

This data is played back to the sector to facilitate a better understanding amongst schools, LAs and Academy Trusts of their own performance at pupil level and compare with the sector. This informs any necessary improvement plans and timely interventions. This is done using View your Education Data (VYED) which presents the data in a report using Microsoft Power BI. We have chosen to use VYED as it is a tool already used by the sector and uses Power BI to report and visualise the data.

DfE started receiving the data from our contractor Wonde 7<sup>th</sup> February 2022. And started sharing it back to the sector 24 May 2022. Since September 2022, DfE have published a fortnightly public dashboard showing national, regional and local authority level attendance rates. Before DfE share any data back, data validation checks are conducted to ensure strong data quality.

Reporting back to the sector using [VYED](#) gives:

- Schools the ability to view all their pupil level data.
- Academy Trusts the ability to view the data of all participating schools they are responsible for. LAs the ability to view the data for all pupils both living and attending a school in the LA area where the school has agreed to participate.
- In the instance where a child is educated in a different LA to where they live, the LA providing the education will have the ability to view that child's data if the school is sharing its daily attendance data.
- All users have access to aggregated data (for the schools who have agreed to participate) for comparator purposes.

This is an improvement to reporting of this data, which was previously only published termly/annually following the census collection. DfE are collecting the same data fields as the Census's, and simply increased the frequency of the data availability and automated its collection. This enables schools, LAs, Academy Trusts and DfE to make timely decisions based on up-to-date data, including supporting early identification of risks/issues so that the support a pupil may need to improve their attendance at school can be implemented.

DfE share the data back to the sector and by doing so aim to gradually reduce manual data collection burdens and better support operational planning.

## **11. Data minimisation**

The agreed data fields are already collected as part of the following Census collections.

School census

Child in Need Census

SSDA903

SEN 2 Statutory Collection

DfE are not collecting any new data fields and are collecting the minimum needed to understand persistent absence and to safeguard children.

DfE are not able to achieve their objectives without processing the personal and special category we are using.

## 12. How we will ensure data quality

This data is collected directly from the school MIS system and as such, should have been checked by the school. DfE do data quality checks routinely on the data when it is received from Wonde. Once the data has been retrieved it is placed into a secure area where all the data is scanned for vulnerabilities. This secure area is called the Transient Zone and once all files have been scanned the data will be available for the use.

## 13. Lawful basis for processing special categories of data

**Substantial Public interest based in law (Article 9(2)(g))** - 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.

Section 10(3) of the DPA 2018 provides that processing meets the requirements of Article 9(2)(g) of the UK GDPR if it meets a condition in Part 2 of Schedule 1 of the DPA 2018. For this processing, the condition met will be paragraph 6 (statutory and government purposes). This requires the processing to be necessary for:

- reasons of substantial public interest; and
- the exercise of a function either (i) conferred on a person by enactment or rule of law; or (ii) the exercise of a function of the Crown, A minister of the Crown or a government department.

The substantial public interest is provided by the processing allowing DfE and its executive agencies to ensure the provision of education and children's services is effective and efficient and function being exercised will be as outlined in response to Q2a (above) which covers the function the processing meets for the reliance on Article 6(1)(e).

## 14. How will this benefit data subjects?

This improved frequency and collection method will benefit data subjects as schools, LAs, Academy Trusts and DfE will be able to identify concerns about pupils' attendance



in a timely way and therefore offer support and intervention quicker. This may include identifying children who may be at risk of harm (safeguarding concerns) enabling support and intervention to reduce risk.

There are no blockers in terms of data subjects being able to exercise their rights in Data Protection Legislation. If a data subject request is received the DfE will consider them on a case-by-case basis and will respond guided by the law on whether rights are granted or not.

No negative effects are expected.

## **15. Access to privacy information**

Data subjects and their parents are informed about this processing via specific DfE privacy notices.

Schools update their privacy notices to explain that they will be sharing this data with DfE and what the purpose is. DfE assists in this by providing templates that schools may wish to use.

The DPIA is subject to annual review, or when any changes to the data processing are made (whichever is the earlier)

DfE have created specific communications and [guidance](#) on the new process and data protection potential concerns for the sector. Enabling them to understand the impact of the changes and decide whether to agree to share the data and be able to explain to parents/carers and children what the benefits are if asked.

## **16. What control do individuals have over their data?**

It remains a statutory requirement for the data outlined above to be submitted to the DfE in the form of the annual/termly Census collections. For those schools who have agreed to share their data daily the collection is in addition to these collections.

The data is processed under Public Task and therefore Data Subjects do not have the right to erasure or the right to portability.

Data subjects and/or their parents can ask the data to be rectified or completed if it is

wrong.

If any errors in the data are identified the data subject can ask for the data to be rectified by contacting the school or by contacting DfE Data Protection Team.

The data subject also has the right to object, data subjects can exercise this right by contacting the DfE Data Protection Team.

## 17. Consultation

DfE have not consulted individuals, we already collect attendance information about pupils from schools via the school census data collection. DfE developed a specific privacy notice for parents/children to explain why the frequency and method of collection has changed. DfE asked schools to make this available to parents via their websites and it has been made available to schools via DfE communications for schools, LAs and Academy Trusts as well as being published on Gov.UK [[Share your daily school attendance data – GOV.UK](#)]. It is published on Wonde's secure hub.

### Legislation

- School Census Collection – section 537A Education Act 1996 and the regulations made under that power – such as the Education (Information About Individual Pupils) (England) Regulations 2013
- Requirement for schools to record attendance data: section 537A and section 434 Education Act 1996 – and regulations made under those powers including the Education (Pupil Registration) (England) Regulations 2006 and the 2013 regs referred to above
- Legal duty for a parent to ensure their child is in school.
- The primary duty is section 7 Education Act 1996.

DfE have engaged with the sector as follows:

Star Chamber (External Scrutiny Board) – general support given, offered to help shape the solution by way of a user group and receive updates on progress and next steps.

Conversations with the Local Government Association (LGA) Association of Directors of Children's Services (ADCS) Trade Unions (TU's) Local Authorities (LAs) Academy

Trusts– supportive of the proposition, made it clear we need to communicate the value to the sector and that this must not place additional administrative burdens on schools.

## **18. The right of access**

DfE have an established Subject Access Request (SAR) process as highlighted in the privacy notice, this can be accessed via the link in the [Privacy Notice](#)

For further information and how to request your data, please use the '[contact form](#)' in the Personal Information Charter at [Personal Information Charter](#)

## **19. The right to rectification**

Data subjects and/or their parents can ask the data to be rectified or completed if it's wrong. DfE has a process in place to comply with this right via our standard "contact" process via DfE Contact us as highlighted in our privacy notice, details copied below:

If you have any questions about this right please contact us at <https://www.gov.uk/contact-dfe> and enter School's attendance data collection as a reference.

## **20. The right to erasure**

DfE has a process in place to comply with this right where applicable via our standard "contact" process via DfE Contact us as highlighted in our privacy notice, details copied below:

If you have any questions about the right to erasure please contact us at <https://www.gov.uk/contact-dfe> and enter School's attendance data collection as a reference.

## **21. The right to restrict processing**

DfE has a process in place to comply with this right via our standard "contact" process via DfE Contact us as highlighted in our privacy notice, details copied below:

If you have any questions about how your personal information will be used, please contact us at <https://www.gov.uk/contact-dfe> and enter School's attendance data collection as a reference.

## **22. Identification, assessment and mitigation of risks**

Summary of Deputy Data Protection Officer advice:

This is an update of the earlier DPIA, on review no medium or high unmitigated data protection risks have been identified. All processing of personal data and special category data is identified as low risk processing.



Department  
for Education

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