

Data Protection Impact Assessment – ‘The Big Ask’ survey of children in England

1. Identifying the need for a DPIA

Project title	‘The Big Ask’: A survey of all children in England
Project aims	<p>The Children’s Commissioner has a statutory responsibility to protect and promote the rights of children, including the most vulnerable.</p> <p>In the wake of the Coronavirus pandemic the Children’s Commissioner for England is leading a Childhood Commission to address the inequalities impacting children revealed by the pandemic which had been hidden from the view of many.</p> <p>This Commission will argue that the prospects and welfare of children must be put at the heart of our economic recovery; and show the way to do it. It will re-cast Beveridge’s ‘five giants’ for children today, identifying the barriers which prevent them having the best childhoods, the best preparation for successful futures, and a better life than their parents. With the largest ever consultation with children in England at its heart, it will propose a 10 year plan with annual metrics to monitor progress, across the sweep of childhood and the span of government.</p> <p>The consultation with children, called ‘The Big Ask’ aims to ask children directly about the following issues:</p> <ul style="list-style-type: none"> • What would improve their lives post-Covid • What their future aspirations are, and barriers to attaining them • About the importance of their relationships, communities and environments • How they feel about the future and the challenges facing the world <p>Children have told the CCO that <i>‘we need to be consulted more and trusted’</i> when asked what they would change for children in England. The Big Ask will put children and young people’s voice at the centre of the conversation around recovery and inform the Childhood Commission which the CCO will use to campaign for change to policy and service delivery affecting children and young people in England.</p>

<p>What type(s) of data processing will be undertaken</p>	<p>There will be five surveys available to children in England to ensure that the survey is accessible and inclusive of all age groups and abilities. The surveys will be designed for the following:</p> <ol style="list-style-type: none"> 1. 4-5 year olds 2. 6-8 year olds 3. 9-12 year olds 4. 13-17 year olds <p>There will also be easy-read versions of the 6-8 and 9-12 surveys designed for children and young people with additional needs who may prefer a more accessible version.</p> <p>The data will be collected through bespoke survey forms on the CCO website.</p>
<p>Why this project needs an impact assessment</p>	<p>The CCO will not collect or process any directly identifiable information from children (such as name, date of birth, contact details or address).</p> <p>However, the data may be personally sensitive due to the number of characteristics asked about in the survey, including the collection of special category data such (as ethnicity). It is theoretically possible that where sample sizes are very small or a child has a particularly unique combination of characteristics, then the information could, when combined with other information, enable a motivated individual to identify a particular child. As a result, the ICO recommends a DPIA is completed.</p>

2. Describing the data processing in more detail

<p>Describe the nature of the processing <i>How will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or another way of</i></p>	<p>Data will be submitted directly through the CCO website through a bespoke online questionnaire. The submitted data will be held on the CCO webserver, which is managed by the DfE infrastructure team, and hosted on Microsoft premises.</p> <p>The CCO website services and maintenance are delivered by a third-party Processor under contract. The Processor has been contracted to build the bespoke web forms for the surveys, conduct testing and maintain the website functions during the data collection period. The contract between the CCO and the Processor contractual obligations to ensure the Processor meets the data protection requirements set out in this document.</p>
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<p><i>describing data flows. What types of processing identified as likely high risk are involved?</i></p>	<p>Once the survey has closed the data will be removed from the webserver and stored on the CCO secure network with access restricted to members of the CCO Evidence Team (roughly 5 members of staff). The CCO network is a restricted part of the Department for Education’s IT infrastructure and therefore conforms to government security standards. The CCO will not share the raw data with any other organisation.</p> <p>Throughout the duration of the data collection the Processor will take extracts from the CCO website to carry out routine service maintenance as part of their contracted services to CCO. These extracts will include the survey responses whilst they are stored on the secure webserver. The Processor are contractually obligated to always uphold UK-GDPR and will not be using the data for any other purpose than stated. The contract also specifies that The Processor will not share the data with any third party and also obligates The Processor to delete any data assets they hold relating to this work once the data collection process has closed.</p> <p>Once received, the data will be cleaned and analysed using common statistical techniques. The home postcode data will be used only to match in higher levels of geography such as Super Output Area (SOA) and local authority (LA). Once these have been matched in, the home postcode data will be securely destroyed. CCO has explored asking children to specify their LA of residence through the survey form, but many children and young people are less likely to know their LA which could lead to non-response. Using LA as the only level of geography will reduce the possible analysis as within LAs there can be significant variation in disadvantage and neighbourhood characteristics. SOA is important geographic information as it enables neighbourhood-level Indices of Multiple Deprivation (IMD) data to be matched in, but children will not know which SOA they live in and therefore cannot be asked to provide this information.</p> <p>The survey forms will also collect qualitative ‘free text’ data from respondents to provide additional detail on their aspirations, hopes and concerns about the future. These questions will not ask for any personal data but it is not possible to prevent a child from entering personal data in these fields if they choose to do so. The qualitative responses will be cleaned using a combination of natural language processing and manual review to remove any information that could amount to identifiable personal data.</p> <p>The rest of the process will be aggregate statistical analysis – therefore there is no processing involved that is high risk.</p>
<p>Describe the scope of the processing</p>	<p>The CCO will not collect identifiable data such as name, dates of birth, phone number, email address, IP address or physical address. The CCO does not hold personal identifiers (name, address, date of birth) for children in England.</p>

What is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The data that CCO will collect is therefore de-identified personal data and individuals cannot be re-identified through other information held by CCO.

The following information will be collected through the 6-8, 9-12 and 13-17 surveys:

- Subjective response data to four questions about future aspirations and ambitions, and barriers to achieving them including free text response questions.
- Demographic characteristics including:
 - Age
 - Gender
 - Whether receiving support from: A youth group or club, a teacher at school, a teaching assistant at school, a youth offending team, a counsellor or therapist, a social worker, a mentor, an advocate, other (free text)
 - Where they live currently: with parents, with foster parents, with relatives other than parents, a children's home or residential care, a secure children's home, a young offender institution, an in-patient mental health setting, in independent accommodation supported by the local council, in semi-independent accommodation supported by the local council, on their own, with friends or in a hostel, other (free text)
 - Which school or college they go to
 - Home postcode
 - Local council (if applicable)
 - Ethnicity

Each question will have an opt-out option of 'I don't want to say' and there are no negative consequences for the child from selecting this option.

The 4-5 survey will ask for the following information:

- Parental perceptions on what will be important in the future for their child including free text response boxes.
- Simple subjective information from the 4-5 year old child on what they like to do at home and school and what they would like to do more of. Response options will be given and there will be no free text option for the child.

The Data Protection Act 2018 identified data revealing ethnic origin or health status as special category personal data. The survey will ask about these characteristics however individuals will have the option to opt-out of that question if they do not wish to provide this information.

The data will be collected from 19/04/21 until 19/05/21. There is only one data collection currently planned.

As this is a voluntary online survey, the CCO cannot know in advance how many children will respond and therefore how much data will be gathered. However, the ambition for this work is to gather the views of as many children as possible to deliver the Commissioner's statutory function of representing the views of all children in England.

To achieve the high response rate the survey is aiming for, the survey will be available to every child in England as an online survey and will be circulated through the following:

- Schools
- Children's advocates
- Young Offender Institutions
- CAMHS Tier 4 units
- Secure children's homes
- Secure Training Centres
- Charities who work with children
- Youth groups and youth organisations
- Social workers
- Local authorities

As the survey is being directly disseminated to secure institutions such as young offender institutes, it is likely that the response data will include responses from some of the most vulnerable children in the country. The CCO will not ask for postcode for children in secure settings. As many secure units have schools which serve only that unit or setting it would be possible to identify the unit a child is in if they provide the name of the school they attend.

The CCO's standard policy is to retain data for 2 years after it has been collected. After two years, data assets are reviewed, and a decision is made whether to delete or extend retention of the data. Data may be retained if it is deemed necessary and proportionate to do so. Once it has been determined that data is no longer required or that it is no longer proportionate to hold the data, then the data will be securely destroyed in line with the CCO Data Protection Policy.

<p>Describe the context of the processing</p> <p><i>What is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?</i></p>	<p>The subjects of the data collection do include children and vulnerable groups, as the statutory remit of the Children’s Commissioner includes: “have particular regard to children who are within section 8A (children living away from home or receiving social care) and other groups of children who the Commissioner considers do not have adequate means by which they can make their views known.”</p> <p>Respondents completing the survey will have the ability to opt-out of any question they do not wish to answer by selecting ‘I don’t want to say’. All questions will have this opt-out option. The ‘landing page’ and the first page of the survey will set out in clear, age-appropriate language how the data will be used by the CCO, so respondents will understand why the data is being collected before progressing with the survey.</p> <p>The CCO will not have a relationship with the children and young people responding to the online survey because it is a survey open to the general public. It will not be possible to give children and young people ongoing control over the data collected through from them through this survey, precisely because the survey will not collect any directly identifiable information, therefore the CCO will be unable to locate and identify the data associated with a particular child.</p> <p>This form of data processing is not novel. Large-scale surveys are well established methods for collecting the views of a large proportion of the population. In 2020, ImpactEd and SchoolDash both completed large scale survey exercises with children in schools and the Children’s Commissioner for Wales conducted the ‘Coronavirus and Me’ survey of 20,000 children in Wales in 2021. In March 2021 the Office for National Statistics is conducting the Census 2021, a survey of all households in England and Wales.</p> <p>The CCO will use natural language processing to process the qualitative data returned. There are established methods for this technique and results will be checked by manual coding of a large sample of responses.</p> <p>There are currently no relevant issues of public concern or security flaws in this form of data collection and analysis.</p>
<p>Describe the purposes of the processing</p> <p><i>What do you want to achieve? What is the intended effect on</i></p>	<p>The Children’s Commissioner has a statutory responsibility to represent the views and interests of children in England.</p>

<p><i>individuals? What are the benefits of the processing for you, and more broadly?</i></p>	<p>Following the Coronavirus pandemic on people’s lives in England, the Children’s Commissioner for England has launched a once-in-a-generation review of the future of childhood, the Childhood Commission.¹ This will identify the barriers preventing children from reaching their full potential, propose policy and services solutions and develop targets by which improvements can be monitored.</p> <p>At its heart will be ‘The Big Ask’ – the largest consultation ever held with children in England. The survey will ask children how the pandemic changed their lives for better or worse, what their aspirations are and the barriers to reaching them, how things are at home, how their communities and local environment could be improved, and how they feel about the future and the challenges facing the world.</p> <p>The Big Ask survey is essential to this programme of work. It will provide children and young people across England with a unique opportunity to contribute to recovery plans being made in the wake of the Coronavirus pandemic. Without this data from children and young people the CCO cannot be confident that the Childhood Commission truly reflects the interests of children in England.</p> <p>The benefits to children and young people in England will be the refocusing of the debate around recovery to children and young people. The CCO will use the data gathered through this survey to advocate for changes in policies and services in order to improve the lives of all children in England.</p> <p>The Childhood Commission will also help set the future priorities of the CCO, and will therefore form the basis of its strategy and business plan in future.</p>
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3. Consulting stakeholders

<p>Whether and how to consult with relevant stakeholders</p> <p><i>Describe when and how you will seek individuals’ views – or</i></p>	<p>The CCO has engaged widely with stakeholders for this research:</p> <p><u>Children and young people:</u></p> <ul style="list-style-type: none"> • The CCO has conducted 12 focus groups with children and young people from across England in November 2020 about what is important to them and the issues and challenges they experience. One of the themes from
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¹ <https://www.childrenscommissioner.gov.uk/2021/03/16/were-launching-a-once-in-a-generation-beveridge-report-for-children-with-an-ambitious-call-to-rebuild-childhood-after-the-covid-19-pandemic/>

<p><i>justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?</i></p>	<p>these groups was that children and young people do not always feel listened to, they feel disenfranchised from government and want to be “<i>consulted more and trusted</i>” when policy decisions are made. The findings from these groups support the implementation of a large-scale survey to provide children and young people with the opportunity to participate.</p> <ul style="list-style-type: none"> • Children and young people across a range of ages have been consulted on the design of the questionnaires and the CCO has used their feedback to inform the question content, language used and survey approach. <p><u>Sector experts the CCO has consulted with:</u></p> <ul style="list-style-type: none"> • Teachers and headteachers on the design of the questionnaires and the methods of implementing the survey. The primary dissemination method for the survey is through schools so feedback from teachers has been sought to understand how to make this process appropriate for schools. • A range of academic experts on childhood and child-centric research on the design of the questionnaires and the CCO has used their feedback to inform the question content, language used and survey approach. • DfE on the design of the survey and the implementation of the survey across sectors. • Research and policy experts on providing representation for Young Carers and ensuring that the response options are relevant and accessible to them. • Cross-community groups who work with hard-to-reach populations such as particular religious communities who do not access the internet for reasons of religious ethos and policy to understand how the survey can be made available and accessible to these groups.
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4. Lawful basis for, and proportionality, of the processing

<p>Lawful basis for processing</p> <p><i>What is your lawful basis for processing?</i></p> <ul style="list-style-type: none"> • <i>Article 6 lawful basis for processing personal data</i> 	<p>This data collection is necessary to the Children’s Commissioner for England’s statutory functions as set out by the Children Act 2004.</p> <p>The Children’s Act 2004 Section 2 sets out the statutory role of the Children’s Commissioner for England:</p> <p><u>Primary function: children's rights, views and interests</u></p> <p>(1) The Children's Commissioner's primary function is promoting and protecting the rights of children in England.</p> <p>(2) The primary function includes promoting awareness of the views and interests of children in England.</p> <p>(3) In the discharge of the primary function the Children's Commissioner may, in particular —</p>
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<ul style="list-style-type: none"> • <i>(if applicable) Article 9 condition for processing special category data</i> 	<ul style="list-style-type: none"> a) advise persons exercising functions or engaged in activities affecting children on how to act compatibly with the rights of children; b) encourage such persons to take account of the views and interests of children; c) advise the Secretary of State on the rights, views and interests of children; d) consider the potential effect on the rights of children of government policy proposals and government proposals for legislation; e) bring any matter to the attention of either House of Parliament; f) investigate the availability and effectiveness of complaints procedures so far as relating to children; g) investigate the availability and effectiveness of advocacy services for children; h) investigate any other matter relating to the rights or interests of children; i) monitor the implementation in England of the United Nations Convention on the Rights of the Child; j) publish a report on any matter considered or investigated under this section. <p>Section 2B of the Children Act confers a further responsibility upon the Children’s Commissioner:</p> <p>Involving children in the discharge of the primary function</p> <p>(1) The Children's Commissioner must take reasonable steps to involve children in the discharge of the primary function.</p> <p>(2) The Commissioner must in particular take reasonable steps to—</p> <ul style="list-style-type: none"> (a) ensure that children are aware of the Commissioner's primary function and how they may communicate with him or her, and
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(b) consult children, and organisations working with children, on the matters the Commissioner proposes to consider or investigate in the discharge of the primary function.

(3) The Children's Commissioner must for the purposes of this section have particular regard to children who are within section 8A (children living away from home or receiving social care) and other groups of children who the Commissioner considers do not have adequate means by which they can make their views known.

The Children's Commissioner is also required by law to publish an annual business plan which includes the Commissioner's proposed main activities for the period covered by the plan. Before publishing a business plan the Children's Commissioner must take reasonable steps to consult children (Children Act 2004, Part 1, [Section 7B](#)). As The Big Ask survey is the method for consultation for the business plan this sets a further legal basis for the work to be carried out.

This statutory function to consult children when carrying out the primary function of the Children's Commissioner as set out in the legislation, relates directly to Articles 6(1)(e) of the UK-GDPR act:

Article 6:

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

(e) **processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;**

Section 2 of the Children Act sets out that it is necessary for the Children's Commissioner to consult with children and young people. Additionally, consultations must include the voice of children who are living away from home or who are otherwise vulnerable. This survey will provide unprecedented opportunity for children and young people in England to make their views known to the Commissioner and the dissemination of the survey will be targeted to reach underrepresented groups and children living away from home. Thus, this survey and subsequent data analysis is necessary for the Children's Commissioner to carry out their statutory function.

Additional steps have also been taken to ensure this collection is proportionate and that the minimum amount of data is being collected to address this project's aim:

- Each child characteristic being collected has a clear purpose and benefit.

- The data collection has been piloted with both children and young people and sector experts, to ensure that the survey questions will deliver against the stated research aims.
- The CCO has explored alternative methods for collecting this data, with particular regard to the most sensitive variables, and established that these alternative methods are neither workable nor sufficient. Thus the final variable set has been determined to be proportionate to this request.

The data will not be shared internationally. The CCO has no plans to share the individual level data with any other organisation or data controller. However, CCO will reserve the right as data controller to share the data with other agencies where there is an appropriate legal gateway to do so and sharing the data is proportionate and necessary. If the data is shared beyond the CCO this will be reflected in our privacy notice.

Access to the data within CCO will be limited to staff who are working on the project team and have received the appropriate civil service training for handling sensitive data. All staff within the CCO have passed the appropriate level of security clearance for handling this kind of data. Processing will be carried out under supervision from the Head of Data Science and the Director of Evidence.

This data collection involves the collection of information on ethnicity (in broad ethnic groups) and mental health which is considered to be special category data under UK-GDPR (see ICO guidance on special category data [here](#)). The CCO's lawful basis for processing this data is the "substantial public interest" condition outlined in **Article 9 2(g)**:

"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;"

In relying on the substantial public interest condition in Article 9(2)(g) the CCO must also demonstrate that it meets one of the 23 specific substantial public interest conditions set out in Part 2 of Schedule 1 of the [Data Protection Act \(DPA\) 2018](#).

There are two substantial public interest conditions under DPA 2018 which apply here:

- 1) Schedule 1, Part 2(6), '**statutory and government purposes**'
6 (1) This condition is met if the processing—

a) is necessary for a purpose listed in sub-paragraph (2), and

b) is necessary for reasons of substantial public interest.

(2) Those purposes are—

a) the exercise of a function conferred on a person by an enactment or rule of law;

b) the exercise of a function of the Crown, a Minister of the Crown or a government department.

See above the highlighted sections from Section 2(2),(3) of the [Children Act 2004](#) which establish the legal basis for processing the special category data collected in this request.

2) Schedule 1, Part 2(8), 'equality of opportunity or treatment'

8 (1) This condition is met if the processing—

(a) is of a specified category of personal data, and

(b) is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained,

Previous research by the CCO has shown that there are disparities in experience between children and young people of different ethnicities² and has produced a substantial body of work demonstrating the negative impact of poor mental health and the need for greater provision of mental health services for children and young people³. Without collecting data on ethnicity and mental health concerns we would be unable to assess whether the survey has adequately reached minority and vulnerable groups.

Additionally, as this survey is concerned with children's aspirations for the future, and the barriers they have identified to achieving good wellbeing in adulthood it is important that ethnicity and mental health are considered so that the data can

² [Vulnerable children | Children's Commissioner for England](#)

³ [Mental health and wellbeing | Children's Commissioner for England](#)

inform our understanding of whether there is an inequality in the barriers experienced by children of different ethnicities or mental health status.

This research provides a unique opportunity for children and young people in England to have their rights, interests and views represented to government and policy makers. Whilst other organisations collect survey data from children and young people the Children's Commissioner is uniquely placed to ensure that their views are carried over to policy action.

The special category data which will be collected will not be linked to any individual level data and will not be shared beyond the Office of the Children's Commissioner except in aggregate, disclosure controlled, statistical tables as part of the Commissioners report on the issue.

The issue of potential disparities in treatment and outcomes has been shown to be in the interest of the public through the creation of the [Ethnicity Facts and Figures website](#), a service run through Cabinet Office. The service was created following instruction from the then Prime Minister Teresa May who recognised that ethnic disparities in public service access and outcomes was an issue which urgently needed to be addressed by Central Government. The Children's Commissioner for England has previously been called to provide evidence to the Women and Equalities Select Committee to give evidence on the disparities in outcomes experienced by children of different ethnic backgrounds which furthers the case that there is public interest in these issues.

The Children's Commissioner's Annual Briefing on the State of Community Mental Health Services has, since 2018 been a key document is assessing the quality of CAMHS services in England. It uses quantitative analysis and qualitative work with children to assess the provision of services relative to the needs of children. The reports have received extensive annual press coverage, and has been cited by numerous other bodies, including three Select Committees, the National Audit Office and, perhaps most importantly, local service providers who have contacted the CCO to tell us that they have used our benchmarking data to argue for greater local investment from commissioners. In addition to this the CCO has also conducted research into children in the secure estate, including those in secure mental health wards. This body of work has demonstrated that there is substantial interest in the experience and outcomes of children and young people with mental health needs and on the basis of the CCO's work on Mental Health, we were invited by NHS England to contribute to the NHS Long-Term Plan and Chair an independent oversight body of NHS inpatient services. This demonstrates that the CCO is well placed as an organisation to continue working to achieve equitable service delivery for children and young people with mental health needs.

The CCO considered the use of consent as the lawful basis for the data processing. However, as the CCO is not collecting any directly identifiable information from children, it is not possible to ensure that children have ongoing control over the processing of their data. Therefore, and as per ICO [guidance](#), 'consent' is not the appropriate lawful basis for processing this data.

Compliance and proportionality measures	<i>Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?</i>	
The Principles UK-GDPR Article.5 or The Bill Section.32 <ul style="list-style-type: none"> • Lawful • Specific • Limited • Accurate • Time-Bound • Secure 	Lawful: <ul style="list-style-type: none"> • What is the legal basis for processing the data? • Does this require the data to be processed, or simply allow it? 	See above section 4.
	Specific: <ul style="list-style-type: none"> • What is the business use/purpose for processing the data? 	As stated in the aims above, the purpose of the data processing is to provide the Children’s Commissioner for England with the most comprehensive view of the experiences and ambitions of children in England ever collected. The Children’s Commissioner is responsible for promoting the views and interests of children in England thus this processing enables the Commissioner to fulfil her statutory function and provide children in England with representation across government. The findings from the survey will also inform the Commissioner’s Business Plan, which the Commissioner must produce by law (and which must by law involve consultation with children).
	Adequate: <ul style="list-style-type: none"> • What assessment has been made on the adequacy of the data being processed in relation to the purpose? 	The survey has been tested directly with children and young people as well as sector experts, such as teachers, academic experts and senior civil servants charged with researching the experience of children. The feedback has been used to ensure that the questions will produce responses most informative to the research aims of the CCO.
	Limited: <ul style="list-style-type: none"> • What assessment has been made on the relevance of the data 	The data is extremely relevant to CCO as there is currently no other available data sources on these issues from children in England. Other organisations have conducted smaller scale questionnaires with children and young people with some similar questions, for example the Good Childhood Survey 2019 and 2020 however these have been conducted with sample sizes of around 2,000

	<p>being processed to the purpose?</p> <ul style="list-style-type: none"> • Will the data be used for any other purpose? 	<p>children and do not capture the breadth of information the CCO requires to inform the Childhood Commission.</p> <p>The data will not be used for any other purpose beyond the Childhood Commission.</p>
	<p>Accurate:</p> <ul style="list-style-type: none"> • How will the accuracy of the data be checked? • How will inaccurate data be corrected? • How will it be kept up to date? • What processes will be in place to manage requests for rectification? 	<p>Upon the data being submitted it will be quality assured by the CCO Evidence team to the extent that this is possible. Quality checks will include:</p> <ul style="list-style-type: none"> • Checking that the data has been submitted by children and young people on the 6+ forms. • Checking that the respondent is located in England, where this is possible. <p>However, as this is an online survey of self-reported subjective views there are limited methodologies for data cleaning post-collection. The survey has therefore been designed with quality checks built-in to minimise the amount of cleaning required once the data is submitted.</p> <p>This data will not be kept up-to-date, it is a single point in time census of children in England. The Commissioner may run a similar survey, or an update to this survey at a later point in time to update the findings, but this would not necessarily be with the same children and young people who respond to this survey.</p> <p>The CCO is not collecting identifiable information such as name, date of birth, address or unique identification number (e.g., NHS Number) which would allow for the identification of a unique, named individual. As such the CCO cannot accommodate requests for rectification.</p>
	<p>Time-Bound:</p> <ul style="list-style-type: none"> • How long will the data be kept? • Is the data covered by an existing retention and deletion schedule? If not will one be agreed with the Departmental Records Officer? 	<p>The CCO's standard policy is to retain data for years after it has been collected. After two years, data assets are reviewed, and a decision is made whether to delete or extend retention of the data. Data may be retained if it is deemed necessary and proportionate to do so. Once it has been determined that data is no longer required or that it is no longer proportionate to hold the data, then the data will be securely destroyed in line with the CCO Data Protection Policy.</p> <p>Secure deletion of data is managed by the Department for Education as all CCO data assets are stored on secure DfE servers.</p> <p>Aggregate tables produced from the individual level data are non-disclosive meaning that they cannot be used to re-identify a unique individual and can be retained indefinitely.</p>

	<ul style="list-style-type: none"> • Will you be able to delete the data when you no longer need it? • If you can't delete it, can you anonymise it partly or wholly? • What processes will be in place to ensure the data is securely destroyed/deleted? 	
	<p>Secure:</p> <ul style="list-style-type: none"> • How will the data be secured and kept safe? • What technical / operational security features and/or policies protect it? 	<p>The data security arrangements for the Children's Commissioner have been formally assessed and assured as appropriate and proportionate using the HMG Information Assurance (IA) process (as described in HMG IA standards No. 1 and No. 2). The assessment process has been led by an independent security specialist registered under the CESG Listed Adviser Scheme (CLAS), and IA Accreditation expertise has been provided to Children's Commissioner by the DfE IA Accreditation Team and Departmental Security Officer. In addition, the privacy impact assessment (PIA) analysis has concluded that the steps taken are appropriate and adequate.</p> <p>All information held by the Children's Commissioner's Office is stored in accordance with our Data Protection Policy and Information Risk Management Policy, both available on request. The organisation also has a dedicated Data Protection Officer who ensures that all data held is registered properly in an Information Asset Register, and processed safely, securely, legally and proportionally.</p>

5. Identified risks and mitigations

Source of risk	Level of risk before mitigation (High, medium, low)	Mitigation(s) (required for medium/high risks)	Risk of harm after mitigation applied (High, medium, low)	Risk acceptable?
Re-identification or direct identification of an individual in the data.	Low	<p>The CCO will not collect any personal identifiers such as name, address or date of birth which would allow the direct identification of a specific individual in the data. Furthermore, the CCO does not possess other information on the identities of children which this data could be combined with.</p> <p>All staff working with data have received appropriate responsible for information training so understand how to work with data to avoid identification or re-identification of data subjects. Staff have undergone relevant security clearance before accessing the data. Only aggregate data which is ILO is shared beyond the evidence team within CCO.</p>	Low	Yes
Children identifiable in publication	Low	Published analysis will be national or regional so small cell sizes are very unlikely. Counts suppressed in line with ONS disclosure control procedures, further statistical non-disclosure procedures applied to any outputs as appropriate (in line with ONS approved researcher training).	Low	Yes
Risk in transferring data securely – information lost or breached	Low	The data will be submitted to the CCO website which is managed by the DfE infrastructure team, and hosted on Microsoft premises. The data will be downloaded directly from this server to a restricted CCO folder. The data will not leave DfE secure systems during transfer. Once downloaded to the CCO secure servers the data will not be shared or transferred to any other organisations.	Low	Yes

6. DPIA sign-off and outcomes

Item	Job title / date	Notes
Measures approved by:		<i>Integrate actions back into project plan, with date and responsibility for completion</i>
Residual risks approved by:		<i>If accepting any residual high risk, consult the ICO before going ahead</i>
DPO advice provided:	Jonathan Gladwin, Practitioner in Data Protection	<i>DPO should advise on compliance, step 6 measures and whether processing can proceed</i>
<p>Summary of DPO advice: TIAA provides advice to the CCO including the interpretation and application of the data protection rules and UK data protection law and draws to the CCO attention any failure to comply with the applicable data protection rules.</p> <p>The DPO agrees with the requirement to conduct a DPIA, details of which are detailed above.</p> <p>The DPO is satisfied that there is a Lawful basis for processing personal data as stated in the DPIA above and that the proposed processing is compliant with the applicable of data protection rules and the CCO's wider data protection obligations and responsibilities.</p>		
DPO advice accepted by:	Haroon Chowdry, Senior Information Risk Officer, Office of the Children's Commissioner	<i>If overruled, you must explain your reasons</i>