

# Data Protection Impact Assessment – The Big Ambition

## 1. Identifying the need for a DPIA

Project title	The Big Ambition
<b>Project aims</b>	<p>The Children’s Commissioner has a statutory responsibility to protect and promote the rights of children, including the most vulnerable. In the lead-up to the next general election, the Children’s Commissioner for England is to make sure the next government hears the voices of all children and young people.</p> <p>The Commissioner wants to hear about what they enjoy about their schools, communities, family life, and the wider world. She also will be asking what they want for the future, their hopes, dreams, and aspirations.</p> <p>That is why, the Children’s Commissioner is launching a survey for all children aged 6-17 and parents of children aged 0-17 to capture the voices of all children in England.</p> <p>This is an opportunity to hear from all children, in every part of the country and in every setting. The survey will be used to encourage policymakers to think about children and young people’s needs, to ensure children’s voices are reflected in the decisions that will affect them in years to come.</p> <p>The Commissioner will also be making a series of visits to schools, children and parents’ groups and other settings, to hear from them. This DPIA primarily covers the survey element of work under The Big Ambition banner.</p> <p>The Big Ambition will provide a comprehensive picture of the practical things that children want to see, which the Commissioner will then encourage all parties to adopt.</p>

Children have told the Children's Commissioner's office (CCo) that '*we need to be consulted more and trusted*' when asked what they would change for children in England. The Big Ambition will put children and young people's voice at the centre of the political conversation and inform campaigns for change to policy and service delivery affecting children and young people in England.

<p><b>What type(s) of data processing will be undertaken</b></p>	<p>There will be one survey available to children and adults living in England. Different versions (shown to different respondents based on their answers to early questions) will ensure that the survey is accessible and inclusive of all age groups and abilities:</p> <ol style="list-style-type: none"> <li>1. 0 to 17 year olds (parents responding on behalf of children)</li> <li>2. 6-11 year olds (primary age version)</li> <li>3. 12-18 year olds (upper secondary age version, including 18 year olds who are still at school/college)</li> <li>4. Easy read version (children of any age)</li> </ol> <p>Other accessible versions will be available on request.</p> <p>The data will be collected through a smartsurvey survey, to which pages on the CCo website and social media will link.</p> <p>In order to organise visits to schools and other settings to discuss and promote the survey, the office will need to gather and use contact details, for example by sending emails to named school staff. This personal data will not be shared outside of the CCo or used for any other purpose.</p>
<p><b>Why this project needs an impact assessment</b></p>	<p><b>For the Big Ambition survey the CCo will not collect or process any directly identifiable information from children (such as name, date of birth, contact details or address).</b></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 (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><b>Describe the nature of the processing</b></p> <p><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>The CCo will be data controller and data processor for The Big Ambition survey. Data will be submitted to the bespoke online questionnaire hosted by the smartsurvey platform. CCo has a password protected smartsurvey account. The data, once downloaded, will be held on the CCo webserver, which is managed by the DfE infrastructure team, and hosted on Microsoft premises. In some instances, paper versions of the questionnaires will be completed by children or parents during visits of CCo staff to settings such as schools, and the data entry into the online survey will be carried out by CCo staff, then the paper copies will be immediately disposed of in Department for Education secure waste bins.</p> <p>The survey data will not be shared with any persons or organisations outside the CCo.</p>
<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 deleted from the smartsurvey account and stored on the CCo secure network with access restricted to members of the CCo Research Team (roughly 6 members of staff). They will analyse the data in order to produce aggregate research outputs, such as reports and blog posts, for publication. The CCo network is a restricted part of the Department for Education's IT infrastructure and therefore conforms to government security standards. 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. The Processor (CCo) will always uphold UK-GDPR and will not be using the data for any other purpose than stated.</p> <p>Once received, the data will be cleaned and analysed using common statistical techniques. Data on the name of the child's school and local authority (LA) will be used to match in geographies including Super Output Area</p>

**Describe the scope of the processing**

(SOA). By including both questions (name of school and LA), we are reducing the chance of non-response if one is unknown and allowing for more accurate cleaning and data triangulation. 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.

The survey forms will also collect qualitative 'free text' data from respondents to provide additional detail on what they think the government should do to make children's lives better. This impersonal wording does not prompt children 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. In any research outputs quoting children's written comments, no details will be published that could enable children to be identified, in line with the CCo's engagement policy. The rest of the processing will be aggregate statistical analysis – therefore there is no processing involved that is high risk.

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.

*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 survey:

- Any free text comments written by respondents in response to a question about what the government should do to make children's lives better.
- Opinions on the importance of policy statements, for example whether children should feel safe and protected.
- Demographic characteristics including:
  - Age
  - Gender
  - Ethnicity
  - Where they live currently, for example, with parents
  - Whether they have any Special Educational Needs or Disabilities
  - Whether they have a social worker
  - Which school, nursery or college they go to
  - The local authority they live in

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

There is only one data collection currently planned, during Autumn and Winter 2023.

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 email to organisations and individuals such as 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

	<p>The Big Ambition visits by the Children’s Commissioner will span England and involve correspondence with a range of professionals in settings such as those, in order to make arrangements. The characteristics and number of these professionals cannot be known in advance but are likely to number in the 10s, and likely to involve non-sensitive data (work email addresses and work phone numbers).</p> <p>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. 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.</p> <p>The CCo’s standard data retention policy is to retain data for 5 years after it has been collected. After this time, 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><b>Describe the context of the processing</b></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</i></p>	<p>The subjects of the data collection do include children and vulnerable groups, as the <a href="#">statutory remit</a> of the Children’s Commissioner includes: “have particular regard to children who are within <a href="#">section 8A</a> (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</p>



*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)?*

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.

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.

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.

The CCo will use thematic analysis and natural language processing to process the qualitative data returned. These are established methods.

There are currently no relevant issues of public concern or security flaws in this form of data collection and analysis.

The Children's Commissioner regularly visits schools and other settings which support children and families; her Big Ambition visits will be similar to other visits in which the Commissioner spends time meeting staff and children.

<p><b>Describe the purposes of the processing</b></p> <p><i>What do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing for you, and more broadly?</i></p>	<p>The Children’s Commissioner has a statutory responsibility to represent the views and interests of children in England.</p> <p>The survey is an opportunity to hear from all children, in every part of the country and in every setting. The survey will be used to encourage policymakers to think about children and young people’s needs, to ensure children’s voices are reflected in the decisions that will affect them in years to come.</p> <p>The Big Ambition will provide a comprehensive picture of the practical things that children want to see, which the Commissioner will then encourage all parties to adopt. The benefits to children and young people in England will be the refocusing political and policy debates to include and indeed foreground 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. The survey will also help set the future priorities of the CCo, so will thus inform its strategy and business plan in future.</p> <p>The purpose of visiting settings as part of The Big Ambition programme of work is to discuss and promote the survey. The Children’s Commissioner’s series of visits will maximise the usefulness of the data by encouraging a high response rate and good data quality.</p>
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### 3. Consulting stakeholders

<p><b>Whether and how to consult with relevant stakeholders</b></p> <p><i>Describe when and how you will seek individuals’ views – or justify why it’s not appropriate to do so. Who else do you need to involve within</i></p>	<p>The CCo has engaged widely to help develop this research:</p> <ul style="list-style-type: none"> <li>• In March 2023 the CCo commissioned Opinium to survey a representative sample of over 3,000 children and parents in England. This provided an opportunity to test questions about policy priorities and what the government should do to make children’s lives better.</li> <li>• In summer 2023 as part of fieldwork on other projects the CCo consulted young people about what they would do to make children’s lives better, to help inform this research.</li> </ul>
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<p><i>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>	<ul style="list-style-type: none"> <li>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.</li> </ul>
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#### 4. Lawful basis for, and proportionality, of the processing

<p><b>Lawful basis for processing</b></p> <p><i>What is your lawful basis for processing?</i></p> <ul style="list-style-type: none"> <li><i>Article 6 lawful basis for processing personal data</i></li> </ul>	<p>This data collection is necessary to the Children’s Commissioner for England’s statutory functions as set out by the Children Act 2004. The Children’s Act 2004 <a href="#">Section 2</a> 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) <b>The primary function includes promoting awareness of the views and interests of children in England.</b></p> <p>(3) In the discharge of the primary function the Children's Commissioner may, in particular—</p>
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- *(if applicable)  
Article 9  
condition for  
processing  
special  
category data*

- 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.

Section 2B of the Children Act confers a further responsibility upon the Children's Commissioner:

Involving children in the discharge of the primary function

**(1) The Children's Commissioner must take reasonable steps to involve children in the discharge of the primary function.**

**(2)** The Commissioner must in particular take reasonable steps to—

(a) ensure that children are aware of the Commissioner's primary function and how they may communicate with him or her, and

**(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.

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 Deputy Director of Research.

This data collection involves the collection of information on ethnicity (in broad ethnic groups) and SEND status 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 ethnicities and has produced a substantial body of work demonstrating the negative impact of poor mental health and the need for greater provision of services for children and young people with disabilities and mental health problems. Without collecting data on ethnicity and special needs 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 and policy priorities for the next government, is important that ethnicity and SEND status are considered so that the data can inform our understanding of whether there is an inequality in the barriers experienced by groups of children.

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. While 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 Commissioner's research outputs.



The issue of potential disparities in treatment and outcomes has been shown to be in the interest of the public through, for example, the creation of the [Ethnicity Facts and Figures website](#), a service run through Cabinet Office. The service was created in recognition of the fact 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.

Mental health is an important part of the picture of Special Educational Needs and Disabilities. The Children's Commissioner's annual briefing on mental health services has, since 2018 been a key document in 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 diverse 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.

<b>Compliance and proportionality measures</b>	<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 UKGDPR Article.5 or The Bill Section.32 <ul style="list-style-type: none"> <li>• Lawful</li> <li>• Specific</li> <li>• Limited</li> <li>• Accurate</li> <li>• Time-Bound</li> <li>• Secure</li> </ul>	<b>Lawful:</b> <ul style="list-style-type: none"> <li>• What is the legal basis for processing the data?</li> <li>• Does this require the data to be processed, or simply allow it?</li> </ul>	See above section 4.
	<b>Specific:</b> <ul style="list-style-type: none"> <li>• What is the business use/purpose for processing the data?</li> </ul>	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 priorities 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.

<p>Adequate:</p> <ul style="list-style-type: none"> <li>• What assessment has been made on the adequacy of the data being processed in relation to the purpose?</li> </ul>	<p>The survey has been tested directly with children and young people and parents. The feedback has been used to ensure that the questions will produce responses most informative to the research aims of the CCO.</p>	
<p>Limited:</p> <ul style="list-style-type: none"> <li>• What assessment has been made on the relevance of the data being processed to the purpose?</li> <li>• Will the data be used for any other purpose?</li> </ul>	<p>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, however these have been conducted with sample sizes of around 2,000 children and do not capture the breadth of information the CCO requires.</p>	

<p>Accurate:</p> <ul style="list-style-type: none"> <li>• How will the accuracy of the data be checked?</li> <li>• How will inaccurate data be corrected?</li> <li>• How will it be kept up to date?</li> <li>• What processes will be in place to manage requests for rectification?</li> </ul>	<p>Upon the data being submitted it will be quality assured by the CCo Research team to the extent that this is possible. 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"> <li>• How long will the data be kept?</li> <li>• Is the data covered by an existing retention and deletion schedule? If not will one be agreed with the Departmental Records Officer?</li> </ul>	<p>The CCo's standard policy is to retain data for years after it has been collected. After five 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"> <li>• Will you be able to delete the data when you no longer need it?</li> <li>• If you can't delete it, can you anonymise it partly or wholly?</li> <li>• What processes will be in place to ensure the data is securely destroyed/deleted?</li> </ul>	
	<p>Secure:</p> <ul style="list-style-type: none"> <li>• How will the data secured and kept safe?</li> <li>• What technical / operational security features and/or policies protect it?</li> </ul>	<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.	Medium	<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>The dataset will be saved securely and the raw data will never be accessed by anyone other than CCo staff.</p> <p>All staff working with data have received appropriate training so as to 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 is shared beyond the research team within CCo.</p>	Low	Yes

Children are identifiable in publications	Low	<p>Published analysis will be national or regional so small cell sizes are very unlikely. Counts will be suppressed in line with statistical disclosure control procedures.</p> <p>Individual level data, specifically qualitative quotes will not include any school or location data to prevent reidentification of individuals in places with small populations.</p>	Low	Yes
Risk in transferring data securely – information lost or breached	Low	The data will be downloaded directly from the CCo's smartsurvey account 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:	Stephanie Friend, Head of Data Collection, 17 July 2023	
Residual risks approved by:	Sarah Taylor, Deputy Director of Research, 17 July 2023	
DPO advice provided:	Carver Tedstone, Practitioner in Data Protection, 17 July 2023	

**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.

The DPO agrees with the requirement to conduct a DPIA, details of which are detailed above.

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.

DPO advice accepted by:

Sarah Taylor, Senior Information  
Risk Officer, Office of the  
Children's Commissioner