

Synergy Wonde Data Protection Impact Assessment

Screening questions

All screening questions should be answered when personal information is involved in a change that is being made.

An answer should be put in each shaded box.

By completing a DPIA, this will help you identify and minimise the data protection risks of the change

Name of the Change	School Attendance Data Transfer into Synergy
Brief description of change being made	The Local Authority has worked in partnership with schools to create the infrastructure for collection of pupil attendance data from schools which relates to respective responsibilities for school attendance and children missing education. This project has been operating since 2019; Wonde is now the sector standard for importing schools' data and this DPIA is being updated accordingly. Synergy no longer supports the previous Group Call / XVault method of data transfer and has moved over to the Wonde solution.

Does the change involve...	Yes	No	Comments
1. The collection or processing of new personal data about individuals or a change in the way current personal data is collected or processed?	Yes		The same data as before is being collected, just using a different method now - Wonde
Note: If an individual can be identified, directly or indirectly using the information you're processing, it is personal data (please see Q3 in the Full DPIA for examples of personal data). Processing includes the recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure or destruction of personal information.			
2. The processing of special category data (including genetic or biometric) or data relating to criminal convictions?	Yes		
Note: Sensitive data (also known as Special Category data) includes racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life, sexual orientation. Criminal-offence data is personal data relating to criminal convictions and offences, or related security measures.			
3. The monitoring of a public space?		No	
Note: This could be the use of CCTV or similar technology to identify people in a public space.			
4. New technologies or systems?	Yes		Wonde is now being used instead

			of XVault. An API will be set up to ingest the data.
Note: This could be using technology that is new to the department as well as using technology that we already use, but in a different way			
5. The use of automated decisions, evaluation, scoring or the profiling of individuals?		No	
6. Matching, combining or comparing with other data sets?	Yes		The matching of Children from the MIS to the Children in our Education System - Synergy
7. Using personal data for a purpose the individuals are not aware of?		No	
Note: This is to ensure that the individual has seen a privacy notice that tells them that their data will be used for this purpose – this is particularly important to check if we are not collecting the data directly from the individual.			
8. Systematic monitoring or tracking (including location and / or behaviour) of individuals?	Yes		Monitoring School Attendance
9. Process data that might endanger the individual's physical health, mental wellbeing, or safety in the event of a security breach?		No	Unlikely as the data will sit within the Synergy system
10. Disclosing personal data to any new third party?		No	Family Connect
Note: This also includes sharing data for a different purpose with a current third party that we use			
11. Storing, transferring, or accessing data from outside the UK?		No	
Note: It is important to understand where our data is at all times, particularly when external providers are involved.			
12. Data being processed on a large scale?	Yes		Daily attendance data will be processed for pupils of the statutory school age who attend a Norfolk school.
Note: If the change involves a large number of individuals or a large percentage of a population of individuals (however small the population) then this should likely be considered large scale.			
13. The specific targeting of vulnerable individuals?		No	The data relates to all children of school age in Norfolk
Note: A vulnerable individual is someone who may have difficulties understanding the implications of their data being processed or, whose circumstances may restrict their ability to freely consent, for example children, elderly people, employees or patients receiving medical treatment. They may also be considered vulnerable due to their financial situation.			

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Completed by:	
Name	Christian King
Job Title	Lead Digital Business Analyst
Date	08/07/2026

Full DPIA

Project Scope		
1. What is the aim of the change?	Norfolk County Council (NCC) uses the Synergy Management Information System to record education information about children who attend maintained schools and academies in the local authority. The data we propose to extract is already currently provided to the LA via the DfE following census returns but reliance on this method means the data can be out of date and does not support us to fulfil our statutory duties to ensure a suitable, full-time education for every child. It also means that, at present schools are asked to submit data in a variety of ways by different teams at different times which is inefficient and risks insecure data transfer. The change is in the way personal data will be collected and processed. The publishing of the Census data termly/annually did not give enough data for the LA to make timely interventions to reduce persistent absence and support vulnerable children. The School Census only gave a termly view that was out of date; this meant no contemporaneous trend data was available, meaning schools and the LA are unable to understand fully patterns, risks and issues for attendance and make operational decisions that could identify and prevent patterns of absence escalating. By changing the frequency (daily) and method (automating) of data collection, the LA will be able to enhance their support schools in understanding their own attendance patterns by providing contextual reports whilst reducing the administrative burden on schools to make statutory returns to the LA. Crucially it will support the LA to rigorously track local attendance data to devise a strategic approach to attendance that prioritises the pupils, pupil cohorts and schools on which to provide support and focus its efforts on to unblock area wide barriers to attendance in accordance with the expectations outlined in the Department for Education Guidance 'Working Together to Improve School Attendance.'	.
2. Does this change link to any another change /project?	Yes – The link to Family Connect must be considered	Yes
	No	

Personal Data

3. What personal data will be processed? Please list each data item involved	Personal details	The data being extracted are the fields that are currently contained within a standard CTF: https://www.gov.uk/government/publications/common-transfer-file-23-specification This only applies to children of statutory school age and no staff data is extracted as part of this process. This process simply supports the LA and schools with the transfer of data in line with statutory responsibilities as outlined in the Education Act 1996. The application extracts 3 files and securely sends to the LA: Pupils – Section 437 Attendance – Section 436a Exclusions – Section 19 (3A/B)	
	Contact details	Address	
	Other kinds of identifier or reference number	Unique Pupil number (UPN)	
	Education	All information included in a standard CTF for children of school age including current school attending sessional attendance data	
	Employment history	No	
	Current employment	No	
	Preferences		
	Financial	No	
	Contractual information	No	
	Technical	No	
	Social Relationships	No	
	Documentary Data	No	
	Open Data and Public Records	No	
	Locational	Current School	
	Personal history	No	
	Housing situation	No	
	Other (please specify)		
4. Does the data include special category data?	Yes	Yes	
	No – go to Question 6		
5. Which special category data is included?	Racial or ethnic origin	Yes	
	Political opinions	No	
	Religious or philosophical beliefs	Yes	
	Trade Union membership	No	
	Genetic data	No	
	Biometric data	No	
	Health & Social Care	No	
	Sex Life	No	
	Sexual orientation	No	
	Criminal offence data	No	

6. What group(s) of individuals does this data relate to?	Norfolk Children of statutory school age (those within Synergy)		
7. Does the data include children or other vulnerable groups? Select multiple options if applicable	Children – please provide details	Norfolk Children of statutory school age	
	Other Vulnerable Groups – please provide details	No	

Processing Data			
8. How will you collect the data?	An API will be set up with Wonde to ingest the data		
9. How will you use the data?	We will use the data to: Track pupil movement onto a school roll; Identify children who have been absent for 10 consecutive school days, persistently and severely absent pupils; Ensure that the LA analysis of pupil attendance provides a comprehensive and up to date picture that informs our strategic aims to improve school attendance and ensures targeted support for the most vulnerable children.		
10.If a number of data sources are being linked together please detail each data set being used.	Matching, combining, or comparing with other data sets can introduce unintended privacy risks that need to be identified through the identification of individuals that would not have been possible if the data was not matched, combined or compared.		
11.Would data subjects expect you to use their data in this way?	CS privacy notice and national guidance in the form of Working Together to Improve Attendance (DfE) would indicate this.		
12.How often will you use the data?	Daily		
13.What are the benefits of processing the data?	Schools will automatically fulfil requirements for providing data about children who are placed on roll at a school and details of children who have been absent for 10 consecutive days or more. A single, secure, robust method of information sharing about pupil attendance and exclusion that is compliant with GDPR. Increased efficiency and a reduction in requests for data submissions and pupil-level queries from the LA e.g. suspensions, pupil absence. Improved capacity to track pupil movement and school attendance reducing the likelihood of children missing education. Ensure the LA has access to up-to-date data leading to more comprehensive analysis to inform targeted support in response to need.		

14.How many individuals are affected?	All children of statutory school age in Norfolk		
15.Will you be processing data for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security?	Yes - Please provide further details	Yes - prevention of school attendance offences in line with the Education Act 1996. This will be sense checked by a human in the Attendance Team before any action is taken. There are no automations for enforcements involved. The data is used to build a picture and inform any decision making by the Attendance Team.	
	No		
16.Has the data controller been identified?	Yes - Please provide further details	Yes – Norfolk County Council	
	No - I need help		
17.Is an Information Sharing Agreement in place?	Yes - Please provide further details	Yes	Sharing with Schools There is no data sharing agreement or memorandum of understanding as the regulations underpinning the school census data collection (namely the Education (Information About Individual Pupils) (England) Regulations, made under section 537A of the Education Act 1996) place the same requirement on individual schools to return the data in scope of the school census to local authorities as they do to return the data to DfE. So, by law, local authorities are permitted to receive the school census data. Sharing with Access Group – This is an Data Processing Agreement (Article 28 Clauses)
	No - I need help		
18. Has a data processor been identified?	Yes - Please provide further details	Access Group/ Wonde	A Data Processor is a person, public authority, agency or other body which processes personal data on behalf of the controller
	No - I need help		
	N/A - No third parties involved		
19.Is a data processor contract in place in accordance with Art 28 UK-GDPR?	Yes - Please provide further details	Within NCC (where applicable) Clauses are incorporated in the contract with Access Group.	

Data Sharing			
20. Will you be sharing data within your organisation or an external service provider or third party?	Yes - Who will you share the data with?	Yes to internal teams that use Synergy	If sharing internally, provide details of the department and point of contact. If sharing externally, provide details of the organisation, department and point of contact.
	No – go to Question 21		
21. How will the data be shared?	An API will be set up to ingest the data straight into Synergy where it will then be visible to Synergy Users		Provide details on how the data will be shared. A diagram may be useful to detail the full data flow in detail including the methods of transfer (e.g. technology used).
22. For what purpose are you sharing the data?	This process simply supports the LA and schools with the transfer of data in line with statutory responsibilities as outlined in the Education Act 1996: Pupils – Section 437 Attendance – Section 436a Exclusions – Section 19 (3A/B)		Explain why it's necessary to share the data. Please note, if you are processing for more than one purpose, you may need to conduct separate DPIAs.

Lawful Basis and Necessity		
23. Which of the following lawful basis are you relying upon? * If you have identified this as your lawful basis, please also detail the specific legislation that you are relying on e.g. Section 4 of the Care Act	Consent - The individual has given clear consent for you to process their personal data for a specific purpose - Article 6.1(a)	
	Contract - The processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract. Article 6.1(b)	
	Legal obligation - The processing is necessary for you to comply with the law (not including contractual obligations). Article 6.1(c)	
	Vital interests - The processing is necessary to protect someone's life -Article 6.1(d)	
	Public task - The processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law. Article 6.1(e)	The data collected refers to pupil attendance and exclusions. This attendance information is collected from the daily attendance registration records schools are required to collect. This

		is not new information being collected this is information that schools already collect but we are changing how often and how we collect it. The collection of this data forms part of a statutory requirement and will contain fields that are already currently contained within a standard CTF file, which is used for the pupil census data already being collected by the Local Authority in the same way. In accordance with regulation 13 of The School Attendance (Pupil Registration) (England) Regulations 2024 all schools are required to share attendance data with the LA as well as the Department for Education Education Act 1996 Section 434: Registration of pupils and duty to make registers available (4) The regulations may make provision— (a)for enabling registers kept under this section to be inspected; (b) for enabling extracts from such registers to be taken for the purposes of this Act by persons authorised to do so under the regulations; and (c) for requiring the person by whom any such register is required to be kept to make to— (i)the Secretary of State, [F1and] F2(ii).
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		(iii)[F3local authorities] , such periodical or other returns as to the contents of the register as may be prescribed. Section 436 (a): Local authorities have a duty to put in place arrangements for identifying (as far as it is possible) those children of compulsory school age in their area who are not school registered or receiving suitable education otherwise than at a school. Local authorities should trace those children and ensure that they receive full-time education. Regulation 12 of the Education (Pupil Registration) (England) Regulations 2006 (as amended by the Education (Pupil Registration) (England) (Amendment) Regulations 2016): All schools must notify the local authority within five days of adding a pupil's name to the admission register and must provide the local authority with all the information held within the admission register about the pupil. All schools must notify the local authority with information about a pupil who is to be deleted from the admission register.
	Legitimate interests - The processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official duty) - Article 6.1(f)	

Only answer if you answered Yes to Q4. If not, go to Q23 24. Which of the following lawful basis are you also relying upon to process the special category data? * If you have identified this as your lawful basis, please also detail the specific legislation that you are relying on e.g. Care Act	Explicit Consent - the data subject has given explicit consent to the processing of those personal data for one or more specified purposes -Article 9.2(a)	
	Employment, social security and social protection (if authorised by law) - processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject- Article 9.2(b)	
	Vital Interests - processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent – 9.2 (c)	
	Not-for-profit bodies - processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects - Article 9.2 (d)	This lawful basis is not applicable to Norfolk County Council
	Made public by the data subject - processing relates to personal data which are manifestly made public by the data subject - Article 9.2(e)	
	Legal claims or judicial acts - processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity -Article 9.2(f)	
	Reasons of substantial public interest (with a basis in law) - 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 - Article 9.2(g)	It is necessary for reasons of substantial public interest - including in reducing absence, how we can support children to stay in school and factors that may be affecting attendance.

	Also linked to s10(3) and schedule 1 part 2 of the Data Protection Act 2018 – you must cite the relevant public interest reason from the schedule.	
	Health or social care (with a basis in law) – processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to conditions and safeguards- Article 9. 2(h) See also Article 9.3 of GDPR, and s11(1) and Schedule 1 part 1 paragraph 2 of the Data Protection Act 2018. These refer to the professionals and confidentiality/secretcy of the data and means that there is a legal expectation that the data is treated confidentially.	
	Public health (with a basis in law) - processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy - Article 9.2(i) See also Schedule 1 part 1 paragraph 3 of the Data Protection Act 2018 – this states that it “is carried out (i) by or under a health professional or (ii) by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law” and means that there is a legal expectation that the data is treated confidentially.	
	Archiving, research and statistics (with a basis in law) - processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject -Article 9.2(j)	

	Linked to s10(3) and schedule 1 part 2 of the Data Protection Act 2018 – you must cite the relevant public interest reason from the schedule.		
25.What is the necessity of using the data?	To fulfil statutory requirements for attendance in line with legislation outlined above and DfE guidance 'Working Together to Improve School Attendance'.		Explain why using this data is necessary to the aims of the change
26.Does the processing achieve your purpose?	Yes	Yes	You should answer 'Yes' if the use of personal data helps achieve the aims of the change
	No		
27.Is there another way to achieve the same outcome?	Yes - what other options are available?	Yes, we could continue to rely on Census data but it is not contemporaneous and thus inhibits the LAs ability to identify and respond to attendance concerns.	
	No		
28.How will you ensure data quality?	A validation process through application of rules and functions in Synergy is in place. In the event that the data extract fails to upload into the Synergy system due to validation errors (i.e. incorrect DOB, no postcode, additional spaces in name) a Data Officer will contact the school directly to request review and amendment of their MIS so this is corrected in the next extract. This will also benefit schools as it reduces the number of validation errors on your census returns as we are validating the data on a regular basis.		
29.Explain how the data will be kept up to date and correct?	As above, the data is extracted daily and a validation process is in place		

Technologies and Systems			
30.Is the project introducing new technologies or systems?	Yes		
	No – go to Question 32	No – Wonde has been in place since 2019 (Used by Family Connect. Is new for this use)	
31.What new technology / system is being introduced?			Include details of technology, system, software, hardware
32.Have both Digital Services and Procurement been involved?	Yes – please provide details		Yes – DS&T Portfolio Lead for Schools is involved as part of the project team. The Head of Social Care and Education Systems has considered this as part of the procurement exercise and all agreed this is the best route for getting attendance data

			as it is the sector standard now as set by the DfE.
	No – please contact IMT and procurement before progressing or provide details as to why not required		
33. Will you be monitoring a publicly accessible place on a large scale?	Yes		e.g., audio/video surveillance of public areas, Wi-Fi/Bluetooth tracking
	No	No	

Data Security, Storage and Retention			
34. How will the data be stored?	The data is stored within the Local Authorities Synergy database hosted on secure servers at County Hall and is mirrored in another data centre off site. Access to the Synergy database is secure and restricted to only those staff members who need access.		Please provide details of the location / system that the data will be held e.g. cloud-based / server
35. Where will the data be stored?	The data we are collecting is stored on our Synergy database hosted on secure servers at County Hall and is mirrored in another data centre off-site (NCC Backup). The Reporting dashboard is hosted on NCC servers		Please provide the physical country location of the data (including where held by third parties)
36. How long will the data be retained for?	Child data in Synergy is archived on an annual basis in August in line with national data retention regulations relating to children with SEN, LAC, At Risk and CWD. Other child data that is no longer required for processing is deleted automatically in line with the retention schedule compliant with GDPR. Synergy provide functionality to enable this process to be run against the data in the MIS to achieve this data cleanse.		Personal data should only be kept for as long as it is needed to fulfil its intended purpose. Think about the purpose for which it is being collected and whether it will it be needed once this purpose is served
37. Describe the measures in place to ensure that this data is kept secure	Access to the Synergy database is secure and restricted to only those staff members who need access. It is mandatory for all staff members to have to complete a GDPR training course before they can access any systems. This is repeated at regular intervals afterwards to refresh their knowledge. Some of the safeguards we use are firewalls, data encryption, physical access controls and information access authorisation controls. Abzorb is our network provider and along with measures NCC takes, the network is monitored continually.		Confirmation should be sought from Information Security Team about the suitability of the measures in place – including the completion of a Technical Security Risk Assessment, if needed.
38. Do you have any prior concerns over this type of processing or security flaws?	Yes - what are your concerns, and how will it affect the project?		
	No	No	

Data Permissions and Records			
39. Do you need to amend your privacy notices?	Yes - Please detail which Privacy Notice needs updating		Current NCC Privacy Notices can be found here
	No - Please detail which Privacy Notice covers this processing	No – C & YP Privacy Notice	
40. Do you need to update the relevant retention schedule ?	Yes - Please detail which Retention Schedule needs updating		
	No - Please detail which Retention Schedule covers this information already		No
41. Do you need to update the relevant Records of Processing Activity (ROPA)?	Yes - Please detail which Records of Processing Activity (ROPA) needs updating		
	No - Please detail which Records of Processing Activity (ROPA) covers this information already		No
42. Does the change involve marketing?	Yes - Is there a process in place for data subjects to opt out?		
	No	No	
43. For Adult Social Services and Public Health only: Do you intend to use information for more than direct social or health care purposes e.g. planning, commissioning, audits, research and development?	Yes - Do you need to comply with the National Data Opt-Out Policy?		
	No	N/A	

Identifying Data Protection Risks – Complete the risk table at the end of this document		
It is important to identify potential data protection risks ahead of time. The earlier a risk is identified, the earlier a plan can be made to mitigate the risk, allowing for a project to be completed successfully Data protection risks can be best identified by speaking to the wider project team. Risks can also be identified by speaking to internal and external stakeholders, subject matter experts and reviewing documentation etc.		
A. Describe the data protection risk	1 - Interception/ Data Breach of data. 2 - Data matching is not exact and possible matches are found.	When answering this question, you should think about what the potential negative outcomes are for your organisation and an individual's personal data, that may arise from the following: • Inaccurate data • ID theft • Unauthorised access to data • Intrusion of privacy
B. What is the potential impact?	1 - Data Breach. Liability (litigation and ICO sanctions). Complaints.	When answering this question, you should think about what the potential

	2 - Inaccurate data matched to child within the Synergy system. Resulting in improper non-attendance action.		negative impacts are for the data subject or your organisation, such as: - Unhappy people - Reputational damage for your customers/organisation - Financial implications																							
C. What is the likelihood of harm before taking any action?	Remote	X	Please consider the chances of the risk happening if no actions were taken before implementation of the change																							
	Reasonable possibility																									
	More likely than not																									
D. What is the severity of harm likely to be before taking any action?	Minimal impact		Please consider the impact of the risk if no actions were taken before implementation of the change																							
	Some impact	X																								
	Serious harm																									
E. What is the risk to the individual before taking any actions? Please use the matrix, using your answers from C and D to work out the risk	Low risk		<table border="1"> <tr> <td rowspan="3">Severity of impact</td> <td>Serious harm</td> <td>Low risk</td> <td>High risk</td> <td>High risk</td> </tr> <tr> <td>Some impact</td> <td>Low risk</td> <td>Medium risk</td> <td>High risk</td> </tr> <tr> <td>Minimal impact</td> <td>Low risk</td> <td>Low risk</td> <td>Low risk</td> </tr> <tr> <td colspan="2"></td> <td>Remote</td> <td>Reasonable possibility</td> <td>More likely than not</td> </tr> <tr> <td colspan="5">Likelihood of harm</td> </tr> </table>	Severity of impact	Serious harm	Low risk	High risk	High risk	Some impact	Low risk	Medium risk	High risk	Minimal impact	Low risk	Low risk	Low risk			Remote	Reasonable possibility	More likely than not	Likelihood of harm				
	Severity of impact	Serious harm			Low risk	High risk	High risk																			
		Some impact			Low risk	Medium risk	High risk																			
Minimal impact		Low risk	Low risk	Low risk																						
		Remote	Reasonable possibility	More likely than not																						
Likelihood of harm																										
	Medium risk	X																								
	High risk																									
F. What action needs to be taken to reduce or eliminate the risk?	1 - Security measures in place at rest and in transit (eg encryption). to be maintained by Wonde/Access Group and NCC (as appropriate) 2 - Contract to be in place between NCC and Access, which covers the Wonde aspect, to ensure lawful use only. 3 - Rules and functions are in place to highlight discrepancies in data and system in place to contact schools to confirm or negate the match.		Risk mitigation is the process of planning and developing options to reduce the identified risks. Please explain what steps will be taken to reduce the identified risk																							
G. Who owns the action?	1 – Wonde/Access Group & NCC 2 – Wonde/access Group & NCC 3 – NCC (CS)																									
H. What date will this be done?	These rules and functions are in place and systems are in place to QA data being matched into Synergy																									
I. What is the likelihood of harm after taking the action?	Remote	X	Please consider the chances of the risk happening once the action has been taken																							
	Reasonable possibility																									
	More likely than not																									
J. What is the severity of harm likely to be after taking the action?	Minimal impact	X	Please consider the impact of the risk once the action has been taken																							
	Some impact																									
	Serious harm																									

K. What is the overall residual risk to the individual? Please use the matrix, using your answers from I and J to work out the risk	Low	X
	Medium	
	High	

Severity of impact	Serious harm	Low risk	High risk	High risk
	Some impact	Low risk	Medium risk	High risk
	Minimal impact	Low risk	Low risk	Low risk
		Remote	Reasonable possibility	More likely than not
Likelihood of harm				

Consultation		
Which stakeholders have you consulted with? (Name and job title/role)	Schools were consulted with at various points between 2019-2021 when the project was initially rolled out. School communication about the change via MI Sheet in December 2023: https://csapps.norfolk.gov.uk/cssshared/ecourier2/misheet.asp?misheetid=68140 Further communications were sent to all schools about the change to Wonde on 5th May 2026: School Attendance Data sharing and statutory returns: Changes to data collection - May 2026 - Norfolk Schools and Learning Providers - Norfolk County Council	Stakeholders must include: System owner(s), Data owners and the Information Governance Team (Compliance) via information.management@norfolk.gov.uk They may also include: DPO, Project management team, corporate governance/compliance, senior management, communications etc.
Have you consulted with the data subjects or any other relevant groups?	Yes - What was the consultation process? E.g., focus group, test cohort, email etc.	
	No - Describe how you will consult data subjects - or justify why it's inappropriate to do so.	No, not required as no change in data we collect
Are you able to evidence the consultations that have taken place, if required?	Yes	Yes
	No – please ensure you can evidence that you have consulted as required	