

Sample DPIA template



This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Submitting controller details

Name of controller	Pathbuddy
Subject/title of DPO	Pathbuddy platform, children's data
Name of controller contact /DPO (delete as appropriate)	Louis Loizou

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

Pathbuddy serves as a dedicated platform with a primary focus on fostering education and networking within the pupil and college alumni community. The platform's core objective is to empower young individuals in making informed decisions by facilitating effective communication between students and alumni. It also allows students to document their academic accomplishments and extracurricular experiences, providing valuable support for their future endeavors in further education and training.

In addition to academic support, Pathbuddy extends its services by offering valuable information about internship opportunities, hosting career fairs for students to connect with university peers and potential employers. The platform serves as a comprehensive resource, delivering updates on open university days, offering guidance on university applications, and assisting students in defining and pursuing their educational and professional goals. Overall, Pathbuddy strives to provide a holistic solution for students, bridging the gap between education and future career success.

Step 2: Describe the processing

Describe the nature of the processing: 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 other way of describing data flows. What types of processing identified as likely high risk are involved?

Personal data is collected via the platform directly from the students and is stored safely by Pathbuddy. Personal data which are considered to lead directly or indirectly to the identification of the student can become -should you select a private profile- not visible and cannot be accessed by other users. Technical data, such as the IP address, is collected automatically from users of the platform and again is not shared or disclosed.

We must get the user's consent before we set any cookies that are not strictly necessary. We get the user's consent by allowing the user to change and save their settings on the cookies page.

Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Describe the scope of the processing: 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?

When a user uses our platform they will give us the following information: their name, email address, date of birth, their username and password, the name of their school and their gender which is optional and their your discretion.

Regularly submitted categories encompass login credentials, a child's name, student email, birthdate, school details, academic achievements, work experience, and other pertinent activities relevant to future applications, potentially incorporating hobbies and interests.

We do not collect criminal offence data.

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue. For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

It covers the geographical area of the U.K.

Describe the context of the processing: 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?

Pathbuddy is a platform for pupils over the age of 13 with a purpose of offering educational content in non-traditional ways and safely networking pupils, alumni and university students.

The pupil along with their parents freely choose to register and we are extremely transparent with the way that we store and use their data.

There are no concerns yet as we meticulously study the relevant Acts regarding GDPR and our sole priority is the safety of the children's data.

Describe the purposes of the processing: 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?

The purpose of Pathbuddy is to emerge secondary school and college students to the future of education, work and networking regardless of any racial, ethnical, socio-economic characteristic or abilities, gender, sexual orientation, gender identity and much more.

It offers educational content, personalized career guidance, help throughout the university application process and networking opportunities of the highest quality.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: 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 your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

The platform was designed to mitigate risks for students and guarantee the security of all their data.

Pathbuddy has created questionnaires and has received important feedback. We understand the importance of the feedback and we always request it from teachers, students, alumni, and parents.

Louis Loizou, the CEO of Pathbuddy has an extensive experience in personal tutoring, is a candidate for PGCE in Mathematics Educations at the University of Oxford and a Governor at Whitefield.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? 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?

Most of the processing carried out by Pathbuddy is essential for its legitimate interests. This includes activities such as handling student and alumni data, ensuring the comprehension, development, and promotion of the platform while safeguarding data, facilitating the production of statistical information on student progress and engagement trends, and gathering user feedback to address queries and complaints.

Students are neither prompted nor encouraged to upload information that is unnecessary for the platform's use or unrelated to the specific developmental needs of the individual student.

We have followed the Age Appropriate Design Code:

1. Best interests of the child:

The platform is designed to enhance a child's access to optimal educational opportunities. Pathbuddy has implemented rigorous security protocols to safeguard student data, consistently assessing and adjusting the platform in response to user needs and evolving legal requirements.

2. Data protection Impact Assessments:

Completed.

3. Age appropriate application:

The platform is designed for children aged over 13 years old, this is why the date of birth is a data which is required.

4. Transparency:

Pathbuddy has a privacy policy, safeguards, community guidelines and terms of service publicly posted on the website in order to ensure the transparency of our actions.

5. Detrimental use of data:

Pathbuddy is in compliance with the Data Protection Act 2018 as well as other statutory provision listed in our Safeguards, in order to ensure that there is not a detrimental use of the children's data. Again our sole priority is the protection and the safety of these children.

6. Policies and community standards:

Pathbuddy has publicly posted community guidelines and safeguards as prevention is extremely important.

7. Default settings:

The pupils and the alumni can choose from the settings whether they wish to accept the cookies or to have a private and public profile giving them full freedom of their actions whilst protecting them at the same time.

8. Data Minimisation:

Students are advised to input only pertinent information aligned with the platform's intended purpose.

9. Data sharing:

Pathbuddy stores and protects the children's data. The only third parties which may have access to data are on the website.

10. Parental controls:

Parents are able to access the child's profile and control their settings, although the privacy policy is strict enough for this to be doomed as unnessecary.

11. Profiling:

Pathbuddy;s profiling is based on an avatar, not a real picture or photograph of their child at no circumstances and a username which is prohibited to include the child's last name.

12. Nudge techniques:

Pathbuddy does not use nudge techniques on the platform.

13: Connected toys and devices:

Not applicable.

Step 6: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
<ul style="list-style-type: none"> Students, especially those in younger age groups, may lack awareness or the capacity to exercise their rights in accordance with data protection laws. Additionally, they may find it challenging to comprehend information regarding their rights and Pathbuddy's legal obligations Children providing excessive personal information or uploading data classified as sensitive beyond the necessary requirements. 	<p>Remote, possible or probable</p> <p>Probable</p> <p>Remote</p>	<p>Minimal, significant or severe</p> <p>Minimal</p> <p>Severe</p>	<p>Low, medium or high</p> <p>Low</p> <p>Low</p>

<ul style="list-style-type: none"> • Risks as set out in the Age Appropriate Design Code: <ul style="list-style-type: none"> ○ physical harm; ○ online grooming or other sexual exploitation; ○ social anxiety, self-esteem issues, bullying or peer pressure; ○ access to harmful or inappropriate content; ○ misinformation or undue restriction on information; ○ encouraging excessive risk-taking or unhealthy behaviour; ○ undermining parental authority; ○ loss of autonomy or rights; ○ compulsive use or attention deficit disorders; ○ excessive screen time; ○ interrupted or inadequate sleep patterns; ○ economic exploitation or unfair commercial pressure; or ○ any other significant economic, social or development disadvantage. <p>Since the platform exclusively serves educational and developmental purposes, the likelihood of encountering risks outlined in the Age Appropriate Design Code is extremely low. Precautionary measures are in effect to diminish or eradicate potential risks, including the prevention of one-to-one interaction or interaction among peers in person and sharing their contact details. The platform is devoid of harmful content, abstains from utilizing nudge techniques and avoids incorporating elements that could lead to heightened risk-taking, disrupted sleep, or any form of harm, disorder, or disadvantage.</p>			

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
<p>Pupils, especially those in younger age groups, may lack awareness or the capacity to exercise their rights in accordance with data protection laws. Additionally, they may find it challenging to comprehend information regarding their rights and Pathbuddy's legal obligations as well as the dangers of sharing their personal information.</p>	<p>A separate section in the privacy policy can be created for the pupils which will explain to them the relevant information regarding the protection of their data and their legal rights that should they wish, they may exercise and the dangers of sharing their personal information with other users on the Platform which is also against our community guidelines.</p>	<p>Eliminated reduced accepted</p> <p>Reduced</p>	<p>Low medium high</p> <p>Low</p>	<p>Yes/no</p> <p>Yes</p>

<p>Additionally, they may find it challenging to comprehend information regarding their rights and Pathbuddy's legal obligations as well as the dangers of sharing their personal information.</p>				
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Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Louis Loizou, CEO, 10 th March 2024	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Louis Loizou, CEO, 10 th March 2024	If accepting any residual high risk, consult the ICO before going ahead
Comments:		
This DPIA will kept under review by:	Louis Loizou	The DPO should also review ongoing compliance with DPIA