Unifrog Education Limited - DPIA

This data protection impact assessment (DPIA) is an adaptation of the template produced by the Information Commissioner's Office (ICO). This DPIA has been prepared in consideration of the following:

- ICO guidance on DPIAs;
- Criteria for an acceptable DPIA set out in European guidelines on DPIAs; and
- the Age Appropriate Design Code.

Submitting controller details

Name of controller	Unifrog Education Limited (Unifrog)
Subject/title of DPIA	Unifrog platform (the platform): provision to children
Name of controller contact	Alex Kelly, Director
ICO Registration number	Z357522X

Step 1: Identify the need for a DPIA

Explain broadly the nature of your online service, and the current stage of design or development. 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.

Unifrog operates an online platform for use by secondary school pupils ("students") and their teachers. The purpose of the platform is to enable all young people to make the best choices, facilitating communication between students and teachers, and enabling students to record their academic achievements and non-academic experiences to support them in their future applications for further/higher education and training.

The platform is accessed via our website www.unifrog.org which contains detailed information as to how the platform operates. All individuals using the platform are alerted to the way in which their personal data is collected and processed via our privacy policy www.unifrog.org/privacy-policy . A separate student privacy notice is available at www.unifrog.org/privacy-notice-student . Additional information sets out the security measures in place to protect personal data; and a comprehensive set of FAQs is also provided, both of which are located on the 'About' page of our website.

This is a student focused platform which students are encouraged to use when their school is registered with Unifrog. We understand the need to give children's personal data special protection and have therefore identified the need for this DPIA to be completed in respect of those children located within the UK and the European Economic Area (EEA). The age range of children whose data we process is 11 to 18 and beyond, as young adults.

This DPIA will be published on our website.

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? Does your service involve any profiling, automated decision-making, or geolocation elements? What are your plans (if any) for age-assurance? What are your plans (if any) for parental controls?

Personal data is collected via the platform, either directly from the students or from their teachers. The majority of data inputted by a student and their teacher is shared between them to enable teachers to support the student's academic development and in their future applications. Most teachers can only access student information that is relevant to their role and their students, but certain teaching roles are granted access to all student information for their school (e.g. heads of sixth form). This ensures no private interactions may occur between a teacher and a student, as a safeguarding measure.

Some personal data and special category data is collected from students and anonymised before being aggregated and shared with a school. This enables the school to pursue its legitimate interests in understanding how different groups of students progress after they have left school. Examples of such data include attendance records, socioeconomic markers and ethnicity.

Technical data is collected automatically from users of the platform and this is shared with third party companies only so far as required for Unifrog to operate the platform. (The technical data we collect is described in step 3 below.)

A survey provider is engaged to act on our behalf in circulating questionnaires or surveys, they also collect certain technical data which is subsequently aggregated and anonymised before being further processed.

The platform does not involve any profiling or automated decision-making. All students are either registered by their school, or issued a code by their school, to enable them to register directly on the platform. This enables a student's age to be established without further need for verification.

Parents are permitted access to the platform to understand its use by a student, however parents are not permitted to view their child's information or any comments inputted about their child by a teacher.

Unifrog will operate its own tracking technology which allows it to track the location from which the platform is accessed. This location tracking can be narrowed to allow a town or village to be identified. This location data will be aggregated and anonymised on collection to ensure users can no longer be identified before being processed any further. Unifrog has obtained legal advice prior to launching this tracking technology and is putting appropriate measures in place to ensure it is lawful and sufficiently protects student information.

All personal data for UK and European students is stored within the EEA. Where a student's school is based outside the EEA, safeguards are in place to protect the transfer of their personal data back to the student, teacher or school, as appropriate. Our Data Sharing Agreement and Data Transfer Impact Assessment are available on the 'About' page of our 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?

Unifrog endeavors to keep the categories of personal data input by children to a minimum. Categories input on a regular basis include login details, a child's name and contact details, date of birth, postcode, details of their school and academic performance, work experience and other activities related to future applications which may include their hobbies and interests.

Student data received from teachers will include details as to a student's academic performance and future prospects and any comments/opinions/recommendations they may have which they input to the platform.

Additional personal data received from a teacher about a student (some of which may be special category data) may include details of ethnicity, nationality, socioeconomic background or socioeconomic markers, whether the student is a "looked-after" child, whether the student has any special educational needs (SEN), disability or mental health difficulties, and attendance records. Schools input these details for their own reporting purposes. Unifrog only accesses these details in the event there is a system error or bug fix required, otherwise all data is aggregated and anonymised before being shared with a school for their own statistical and reporting purposes, as referred to above. We then use this aggregated data for own purpose of understanding how the platform is used.

We do not collect criminal offence data.

Technical data includes information such as the type of device used to access the platform, IP address and browser type and includes tracking information to record interactions with the platform, for example the pages visited and any links accessed or search tools used. As mentioned above, the tracking facility also allows limited location tracking, the data resulting from which is anonymised on collection.

The platform is available for use by children in the UK and Europe as well as in the US, Asia and Australasia.

Student accounts are deleted in full four years following their last use of the platform. We retain the data for four years to enable students to access their own data in that period, e.g. after they have left school but are still making applications for further/higher education, training and employment.

Describe the context of the processing: what is the nature of your service? Are you designing it for children? If not, are children under 18 likely to access it anyway? What is the likely age range of your users? How much control will they have? Would they understand and expect you to use their data in this way?

The platform is specifically designed for use by students aged between 11 and 18 to give them the best possible forum within which to maximise their academic development and plan and apply for future educational or training opportunities in collaboration with their teachers.

Students are only able to register on the platform following a contractual agreement between their respective school and Unifrog. The school registers the student or facilitates the student's own registration; a student cannot register to use the platform independently.

Unifrog clearly communicates the way in which it processes all personal data on the platform. Unifrog acknowledges that children's data warrants special protection and has prepared a student privacy notice for display on the platform. This is drawn to students' attention when visiting the platform so all students are made aware of the way Unifrog processes their 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 for children?

The purpose of the platform is to encourage and enable all students to find the best opportunities, regardless of background and upbringing.

A principle that underpins the platform, and Unifrog as a business, is positive social impact.

The platform enables teachers and students to interact, and students can input details of all their activities, experiences, performances and applications. Students can access this information throughout their educational development and receive support from their teachers in the process. The platform also empowers teachers to effectively manage the progression process.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views - and specifically how you will seek the views of children and parents – or justify why it's not possible to do so. Who else do you need to involve within your organisation?

Alex Kelly the co-founder of Unifrog has extensive teaching experience and previously started the Access Project, a charity that helps disadvantaged children access prestigious universities.

The platform has been developed to minimize risk to students and to ensure all their data remains secure. Unifrog continually consults with teachers, parents and students, typically speaking to one user about platform design every day. Unifrog has a general culture of getting feedback all the time on all aspects of the platform. There are various systems by which feedback is passed back to the design team.

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 measures do you take to ensure processors comply?

The majority of Unifrog's processing is necessary for its legitimate interests or those of the relevant school. For example, we process student and teacher data so that we may comply with our obligations to the school, so we can understand, develop and promote our platform and keep data safe, to enable us and the school to produce statistical data as to how students progress and to show trends in engagement, and so we may obtain users' views and respond to queries and complaints. We rely on consent to send newsletters or information about other products or services we offer, and to enable schools to contact students about various events.

Where special category data is collected to enable a school to understand how different groups of students progress, this processing is necessary for statistical purposes in the public interest. Other special category is processed by schools to support its students, which is necessary for reasons of substantial public interest.

Students are not prompted or encouraged to upload any information which is not required for the use of the platform and/or relevant to the particular student's developmental requirements.

The various security measures in place are detailed on the Unifrog website, these include multiple firewalls, encryption, layered access, secure servers, back-ups and vulnerability assessments. Teachers are bound by the terms of an agreement with the school and are only permitted access to the platform in compliance with those terms.

Set out below is a summary of the specific measures Unifrog has taken to meet each of the standards in the Age Appropriate Design Code:

1. Best interests of the child:

The purpose of the platform is to promote a child's ability to access the best education opportunities. Unifrog has put in place stringent security measures to ensure the protection of student data and continually reviews and adapts the platform according to the needs of users and developments in law.

2. Data protection Impact Assessments:

Completed.

3. Age appropriate application:

All access is approved by the child's school, therefore no age verification process by Unifrog is necessary. The platform is specifically designed for use by children aged 11-18.

4. Transparency:

Unifrog has a privacy policy and a student privacy notice on the platform. Students are directed to read the student privacy notice when accessing the platform.

5. Detrimental use of data:

Unifrog keeps up to date with data protection laws and is in regular contact with schools to avoid the potential for misuse of personal data or the use of personal data which would be detrimental to a child.

6. Policies and community standards:

Unifrog has an agreement with each school relating to its use of the platform. Unifrog has recently updated its privacy policy and student privacy notice, both of which are available on the website.

7. Default settings:

Student consent is obtained to Unifrog newsletters and updates from a school.

8. Data Minimisation:

Students are encouraged to only input details which are relevant to the purpose of the platform.

9. Data sharing:

Student data is shared with teachers and a limited number of service providers. Unifrog does not share student personal data unless it is necessary for the service or the maintenance of the platform.

10. Parental controls:

Parents are unable to view their child's data or limit a child's use of the platform. However given the nature of the platform and the content, the risks to children are very low, so parental controls are unnecessary.

11. Profiling:

Unifrog does not undertake any profiling on the platform.

12. Nudge techniques:

Unifrog does not use nudge techniques on the platform.

13: Connected toys and devices:

Not applicable.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include as a minimum an assessment of particular risks to children as listed in the DPIA standard in the age appropriate design code. You may need to consider separately for different age groups.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
1. Data held in the platform is accessed and otherwise processed inappropriately and unlawfully by its users or other unauthorised individuals.	Remote	Significant	Low
	Possible	Significant	Medium
2. Students (particularly younger students) are unaware of and/or unable to exercise their rights under data protection law or do not understand information provided to them about their rights and Unifrog's obligations under the law.			
	Probable	Minimal	Low
3. Children uploading more personal data than is necessary/uploading special category data.	Remote	Severe	Low
4. Risks as set out in the Age Appropriate Design Code:			

a. physical harm;
     b. online grooming or other sexual exploitation;
     c. social anxiety, self-esteem issues, bullying or peer pressure;
     d. access to harmful or inappropriate content;
     e. misinformation or undue restriction on information;
     f. encouraging excessive risk-taking or unhealthy behaviour;
     g. undermining parental authority;
     h. loss of autonomy or rights;			

i. compulsive use or attention deficit disorders; j. excessive screen time; k. interrupted or inadequate sleep patterns; l. economic exploitation or unfair commercial pressure; or m. any other significant economic, social or development disadvantage. As the platform is for educational and development purposes only, it is extremely unlikely to carry any risk in the areas identified in the Age Appropriate Design Code (set out in Step 5 below). Measures are in place to minimise and/or eliminate the potential for these, such as preventing one-to-one interaction/interaction with peers. The platform does not contain any harmful content, it does not use nudge techniques or receive any payment from students, nor does it encourage or incorporate any aspects which would result in excessive risk taking, interrupted sleep or other harm, disorder or disadvantage.			

Step 6: Identify measures to reduce risk

Identify additional measures you could or are taking 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**
Students (particularly younger students) are unaware of and/or unable to exercise their rights under data protection law or do not understand information provided to them about their rights and Unifrog's obligations under the law.	A separate student privacy notice is on the website, Unifrog is investigating ways of communicating this to younger students.	Reduced	Low	Yes

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Alex Kelly, Director 1 September 2021	Integrate actions into project plan, with date and responsibility for completion
Residual risks approved by:	Alex Kelly	If accepting any residual high risk, consult the ICO before going ahead
Comments:		
This DPIA will kept under review by:	Alex Kelly	The person responsible for data protection compliance within the organisation should also review ongoing compliance with DPIA