

Morrisby DPIA

Policy

Date 9/9/25

EXCELLENCE AND EQUITY WITH INTEGRITY

Date of Approval:	
Approved by:	LAB
Date of next Review:	September 2026



Consilium Academies uses the Morrisby Careers software system. Established in 1967, Morrisby exists to help every student take on a rewarding career journey that suits their abilities, personality, and ambition. Morrisby provides the leading careers education, information, advice, and guidance (CEIAG) service to schools, colleges and careers institutions across the UK and Europe, celebrating international successes.

As such Consilium Academies must consider the privacy implications of such a system. The Data Protection Impact Assessment is a systematic process for identifying and addressing privacy issues and considers the future consequences for privacy of a current or proposed action.

The Data Protection Impact Assessment looks at the wider context of privacy considering Data Protection Law and the Human Rights Act. It considers the need for a career software-based system and the impact it may have on individual privacy. The school needs to know where the data is stored, how it can be transferred and what access possibilities the school has to its data.

The trust will need to satisfy its responsibilities in determining whether the security measures that Morrisby has taken are sufficient, and that the rights of the data subject under the GDPR is satisfied by the trust.

Consilium Academies aims to undertake this Data Protection Impact Assessment on an annual basis.

A Data Protection Impact Assessment will typically consist of the following key steps:

1. Identify the need for a DPIA.
2. Describe the information flow.
3. Identify data protection and related risks.
4. Identify data protection solutions to reduce or eliminate the risks.
5. Sign off the outcomes of the DPIA.

Submitting controller details

Name of controller	Morrisby Career
Subject/title of DPO	Morrisby Career Software with Work Experience Package.
Name of controller contact /DPO (delete as appropriate)	Claire Bell

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. Summaries because you identified the need for a DPIA.

Morrisby 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 <https://app.morrisby.com/login/> 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 <https://www.morrisby.com/legal/privacy>

This is a student focused platform which students are encouraged to use when their school is registered with Morrisby Careers. 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.

Morrisby Careers has extensive information and tools to match careers, subject choices, apprenticeships, and higher education for every individual. It can form the foundation to build your careers education, guidance and PSHE programmes upon. The software has been purchased for all trust schools to support with the Personal Development offer.

The system encourages all pupils to explore a wide range of courses and careers and play “what if” by adjusting expected qualifications up or down. Morrisby Careers helps students organise their progression through school with the built-in action planning and face-to-face meeting tools. This makes it easy for students to take control of their own careers journey while also making it simple for tutors to engage in the wider careers conversation and provide specific support at appropriate times.

Careers leaders and teachers are well supported with a management system that is flexible and powerful. With multiple dashboards to interrogate data and a student database that makes it easy to see progress by vulnerable groups, classes, and cohorts to name a few. Key data can also be downloaded for further interrogation. The student page groups all the key information and progress together so you can see at a glance how an individual is progressing. This can allow tutors and pastoral staff to get the full picture and make it easy to prepare for individual conversations and guidance with built-in face-to-face meeting tools and student action planning.

Morrisby Careers provides students with a digital career’s library. With rich information on careers, subject choices, apprenticeships, and higher education. Each career contains detailed routes to entry, qualification requirements and labour market information. The additional resources area makes it easy to signpost local and national information sources. Student self-discovery Powerful but simple assessments match interests and preferences to specific careers and courses. The student’s unique profile is analysed against more than 600 careers and the closest matches are highlighted for further investigation. They can be ‘favourited’ by the student or replaced with closer matches.

Immediate results on completion of a short interests-based questionnaire Aspirational career and subject suggestions matched to the individual Access to over 600 career descriptions including videos, case studies and useful links Information on entry requirements, routes to careers and salaries Flexible action planning tools and a careers locker to

store documents experiences and interactions. Quick and easy for students to use with immediate results.

Use of the manager system to track student progress and manage records Custom groups to make it easy to track vulnerable students and specific sets such as “Medicine” or “Oxbridge” Download student reports Face-to-face interview tools to record key interactions such as Options Lesson plans and video tutorials available. Helps meet the Gatsby Benchmarks Raises students’ self-awareness, aspirations and increases motivation Facilitates option choices at 13/14, 16 and 18+ Embedded Skills Builder employability skills framework Assurance of using a matrix accredited organisation.

Track all career education, enrichment activity and skills development. Morrisby is Matrix accredited, the quality standard for organisations to assess and measure their advice and support services for individuals in their choice of career, learning, work, and life goals.

Work Experience WEX Platform.

This is a digital platform should completely transform your work experience, work-related learning, and careers programmes and the way you manage them. This app should be

1. Saving you time and your school money.
2. Reducing administration and enhancing communication.
3. Straight forward employer engagement & risk management.
4. Improving your students experience (meaningful placements).
5. Easy reporting for Ofsted, Gatsby, and Matrix.

Working in partnership with Changing Education gives us access to new opportunities: This means that we can tailor the digital platform to manage your specific work experience requirements seamlessly through CONNECT.

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?

Data will be shared with Morrisby Ltd to enable access for students to their digital career's guidance platform. This may include the Work Experience offering. The data is MIS synced from the schools inhouse MIS to the Morrisby platform. This is done via an aggregator 'Wonde' or 'Groupcall'.

The data that will be shared via MIS sync if via Wonde:

- Student First, Last name
- DOB
- Student email address
- Groups
- EAL
- ULN
- UPN
- Student leaving details.
- Pupil Premium – Non mandatory
- SEN – Non mandatory

Staff details can be synced in via MIS too however, this is optional and controlled by the Data person at school who will be able to dictate the available information via the Aggregators approval process.

Personal data is collected via the platform, either directly from the students or from their teachers. Most 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 Morrisby Careers 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.

Morrisby Career can 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. Morrisby Careers 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.

<https://www.morrisby.com/legal/data-sharing-agreement-mis>

Groupcall = All data is mandatory (data listed above)

<https://www.morrisby.com/legal/data-sharing-agreement-mis>

<https://www.morrisby.com/legal/wex-suite-data-processing>

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?

Nature of the data as per Step 2

To enable students and staff to use the Morrisby digital platform. Special category – SEN – Optional to share via SIMS

Data collected will be as per Step 2 Refer to link for Data sharing agreement – MIS.

MIS is done at the beginning of the academic year and throughout the year for new student starters/leavers. The Sync can be done by staff inhouse or by Morrisby Staff/Support

All staff at Morrisby are DBS checked.

<https://www.morrisby.com/legal/data-retention>

<https://www.morrisby.com/legal/gdpr>

<https://www.morrisby.com/legal/wex-suite-data-processing>

Morrisby Careers endeavours 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 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.

Morrisby 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 relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

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 Morrisby Careers. The school registers the student or facilitates the student's own registration; a student cannot register to use the platform independently. Morrisby Careers clearly communicates the way in which it processes all personal data on the platform. Morrisby Careers 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 Morrisby Careers processes their data.

Morrisby Ltd is a supplier of a digital Careers guidance platform.

Data will be synced in from the school's in-house MIS, so source is the schools MIS.

<https://www.morrisby.com/legal/gdpr>

<https://www.morrisby.com/legal-information>

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 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 Morrisby Career 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.

Data is used to enable student and staff access and use of the Morrisby platform. This will enable students to complete a questionnaire relating to their interest, priorities, and Study Interests, which shows Career suggestions based on the results. There is also resource, subject selection, and activity recording for the student. The platform can also enable students to access the work experience element to self-place. It also enables staff to manage the admin side of the Work Experience element and activity recording to move to a more efficient process.

Morrisby Careers have taken several measures to enhance our security infrastructure. Publishing details of security measures can pose a security risk, but we are able to give some example general guidelines on some of the measures we take:

- ISO27001 certification
- 365/7/24 Managed SIEM for proactive monitoring and detection of intrusions and threats.
- Annual penetration testing performed by a CREST certified company.
- Encrypting of data at rest and in transit.
- Daily automated vulnerability scans.
- Patches and updates are applied promptly and regularly.
- The use of tightly configured Firewalls.

- The use of virus and malware protection.
- Strong password policy for all employees.
- Website user accounts are locked out after too many login attempts.

The benefits of the software is that everything is one place to plan, track, monitor, and evaluate the personal development and career education within our trust. The student has a digital record of achievement. CPD can be planned for teachers with a bank of useful teaching resources as well as developing individual action plans for all students. Those especially in KS4 making decisions about post 16 pathways.

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 consultation process started with an introductory meeting through the Northeast Learning and Education Partnership as we were not meeting Gatsby Benchmark 3 which is addressing the individual needs of each pupil.
<https://www.gatsby.org.uk/education/focus-areas/good-career-guidance>

The school strengthens students' personal agency and self-advocacy skills by encouraging them to access and take ownership of their career development records. Students should be able to draw on careers experiences and employer encounters and turn them into a clear and compelling story for applications and interviews. The school collects and maintains accurate data for each student around their education, training, and employment destinations for at least three years after they leave. This information is shared with current students to support ongoing review and evaluation of the careers and enterprise programme.

I then arranged a demo with Kate Hewson Associate Director – School Improvement, Tara Welsh Safeguarding Lead and Stuart Conway - Head of Assets & Compliance. All agreed to consult with the school improvement team. This was agreed and then we formally consulted Headteachers with Chris Davis. All Headteachers approved and wanted to go ahead with the system for all trust schools.

LAB are being updated on the **19th of March 2024**.

The platform has been developed to minimize risk to students and to ensure all their data remains secure. Morrisby Careers continually consults with teachers, parents, and students, typically speaking to one user about platform design every day. Morrisby Careers 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 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?

TMO - Morrisby Limited, trading as The Morrisby Organisation, a limited company registered in England under 1183700, whose registered and trading address is Gaddesden Place, Great Gaddesden, Hertfordshire, HP2 6EX, UK.

Most of the Morrisby Career 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 student's 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 student's developmental requirements. The various security measures in place are detailed on the Morrisby Career 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 Morrisby Career 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. Morrisby Career 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 Morrisby Careers is necessary. The platform is specifically designed for use by children aged 11-18.

4. Transparency: Morrisby Career 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: Morrisby 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: Morrisby has an agreement with each school relating to its use of the platform. Morrisby 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 Morrisby 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. Morrisby does not share student personal data unless it is necessary for the service or the maintenance of the platform.

10. Parental controls: Parents can view their child's profile but 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: Morrisby does not undertake any profiling on the platform.

11. Nudge techniques: Morrisby does not use nudge techniques on the platform.

12. Connected toys and devices: Not applicable.

Step 5: 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
	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
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 Morrisby obligations under the law.	Possible	Significant	Medium
3. Children uploading more personal data than is necessary/uploading special category data.	Probable	Minimal	Low
<p>4. Risks as set out in the Age-Appropriate Design Code:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	Remote	Severe	Low

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
		Eliminated reduced accepted	Low medium high	Yes/no
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 Morrisby obligations under the law.	A separate privacy notice is on the website, Morrisby 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:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons

Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA

