

Data Protection Impact Assessment (DPIA)			
Staff member's name	Mark Hart	Staff member's role	IT Manager
Date	16 <sup>th</sup> November 2020		

Reason for DPIA
<p>Transforming Lives Educational Trust (“the Trust”) use an online learning platform to enable us to meet our responsibilities of providing high quality remote education when this can not be safely delivered in our academies and to enhance the learning of individual pupils of the academies within the Trust as part of their academy-delivered curriculum.</p> <p>DPIA is required because of the potential high risk associated with a vulnerable subjects’ data being processed and shared with a processor, the processing of images and audio, video communications and recordings of lessons.</p> <p>The online learning platform(s) we are looking to engage include:</p> <ul style="list-style-type: none"> <li>• Microsoft Teams</li> <li>• G Suite for Education/Google Classroom</li> <li>• Loom</li> <li>• Zoom</li> <li>• Class Dojo</li> </ul> <p>These online services promote the education of the pupils. We ask for consent where the online service is not a usual method of learning throughout the Trust and its academies. We rely on public task where this is a programme used regularly for the education of the pupils.</p> <p><b>Video communications:</b></p> <ul style="list-style-type: none"> <li>• Pupils will log on to the platform and engage in video communications to replicate the classroom experience as much as possible. This will assist with pupil engagement. This will involve processing data relating to images and audio.</li> </ul>

- Parents/individuals will be sent instructions on how to use the system and will be informed on how to mute the microphone / the academy will ensure all pupils will have the microphones switched off until invited to unmute their microphones when appropriate.
- Names of pupils will be visible to others by default (all pupils will already be familiar with individual names from their class). Where this is an issue the pupils name can be amended in their account settings prior to remote learning.

**Recording sessions:**

Lessons will be recorded for the following purposes:

- For purposes of safeguarding

## Description of processing

Data is collected from the data subject and then manually shared with the relevant processor. Access is granted to the data fields listed below. The processor will then extract the data and upload it to their systems.

The data will be stored with the processor, who will have access to this information should the user lose their log in details. Once the password has been changed by the pupil, this information is not visible to the Trust and can only be reset. The data is also stored with the academy/Trust as the administrator, and the class teacher also has access to the data.

List of data to be input/shared:

- First Name
- Surname
- email address

The processor's contract/agreement has been consulted for this DPIA in terms of their security processes.

### ***Microsoft Teams Policy***

Only available to staff and will use credentials already provided for access to school systems.

### ***Google Classroom Policy***

- Pupils will not be able to initiate private video calls with other pupil users but will be able to join a call initiated by a member of staff.
- Pupils will only be able to use the chat function to communicate with other pupils within a monitored online classroom space. Private chat between pupils will be disabled but will be available between teachers and pupils to support learning.

Recordings will be stored on a secure cloud platform and permanently deleted after 3 months unless legal reasons require the recording to be retained, in which circumstances it will be deleted as soon as permissible. Recordings may be shared with the relevant official authority if required as a result of a safeguarding concern. This will be in line with the school's safeguarding, child protection and data protection policies.

## Scope of processing

Data includes:

Pupil:

Names

Images

Audio

Email address

Staff:

Names

Images

Audio

Email address

Any relevant data in relation to assessment may be downloaded by the school and saved on the pupil's education records.

No special category data is held.

The data involves 2199 pupils and 124 staff. The data will be processed in line with the Trust's retention policy.

Only staff and pupils within the Trust will have access to online platforms.

## Compliance and Proportionality Measures

Our lawful basis will be public task (essential for running the Trust). The processing helps to achieve the purpose of educating pupils. The Trust is required to provide high quality education during periods of self-isolation or in the event of local/national lockdown. Alternative measures, such as paper assessments/quizzes can be used, but the online platform offers a simple, quick and effective tool for learning. The use of live lessons will encourage pupils to actively engage in their lessons and will allow for questions to be asked in 'real time'.

Only the personal data necessary for the performance of the online platform, as set out in the General Data Protection Regulations (GDPR) compliant contract, will be collected for processing.

The right to be informed will be supported with the aforementioned privacy notices and data subjects can visit the processor's privacy notice for further information.

The right to erasure will be supported where EITHER consent is withdrawn OR a valid objection to the processing is received.

The right of access will be supported by the Trust's/academy's subject access request procedure, published on the website. The processor contract outlines that they will help the controller to achieve compliance with data protection obligations, which will include supporting the right to access.

The right to rectification is supported in the Trust's/academy's annual data collection/data checking sheets. However, specifically, pupils and/or parents can update details at any point via the academy's contact details. The processor allows for changes to login/account details when required.

The Trust will consider any other data that may need to be rectified and communicate this with the processor where this is deemed necessary.

The right to restrict will apply where possible.

Considerations to human rights:

Right to privacy may be impacted due to video communications resulting in teachers and other individuals hearing what goes on in people's homes. To mitigate this risk, individuals will have the option to/teachers will ensure microphones are switched off.

**Identify and assess risks**

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b> Remote, possible or probable	<b>Severity of harm</b> Minimal, significant or severe	<b>Overall risk</b> Low, medium or high
Hacking into processor site	Remote	Significant	Medium
Loss of login/passwords and or loss of access into the site	Possible	Minimal	Low
Data used outside the scope of its original purposes (including pupils using the online platform as a form of social media)	Possible	Significant	Medium
Impacts on individual's right to privacy	Possible	Severe	Medium

**Identify measures to reduce risk**

<b>Risk</b>	<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b> <i>Eliminated</i> <i>Reduced</i> <i>Accepted</i>	<b>Residual risk</b> <i>Low</i> <i>Medium</i> <i>High</i>	<b>Measure Approved</b> <i>Yes/No</i>
Hacking into processor site	Online Security measures from contract	Reduced	Low	Yes
Loss of login/passwords and or loss of access into the site	Outline the details on how lost login details will be managed/supported	Reduced	Low	Yes
Data used outside the scope of its original purposes (including pupils using the online platform as a form of social media)	<p>The contract/agreement meets the requirements of GDPR – assurances are given in the legally binding contract for the purposes for which the data will be used/processed.</p> <p>Academy staff are briefed and made aware of the Trust’s data protection and information security policy.</p> <p>For pupils using the function as a form of social media, rules on using the system will be in place and this will be monitored / chat functions will be disabled at all times/at the end of each lesson.</p>	Reduced	Low	Yes
Impacts on individual’s right to privacy	<p>Individuals will have the option to mute their microphone / teachers will ensure all participants mute their microphone.</p> <p>Pupils will be invited to unmute their microphone when appropriate for engaging in the lessons and then asked to unmute again. Parents will be made aware of the lessons and timetables and given the opportunity to voice their concerns and exercise their right to object.</p>	Reduced	Low	Yes

**Sign Off and record outcomes**

Item	Name/Date	Notes
Measures approved by	Mark Hart / 25 <sup>th</sup> November 2020	
Residual risks approved by	Mark Hart / 25 <sup>th</sup> November 2020	
DPO advice provided		
Summary of DPO advice		
DPO advice accepted or overruled by:		
Comments		
Consultation responses reviewed by:		
Comments		
This DPIA will be kept under review by:	Mark Hart – IT Manager	

