**Data Protection Impact Assessment**

**General Details**

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| --- | --- |
| Project Title | Seesaw |
| Project Lead |  |
| Date DPIA Completed |  |

**General Project Description**

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties:

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| With pupils self isolating and needing to access school work, and with the possibility of school closures, schools need a way to share school work with parents and a way to share videos and pictures with pupils in a interactive way.  This product will allow teachers to communicate to classes, parents, share work and share videos.  It is a cloud based portal/platform  This is only being used on a free trial until June. If this trial is taken on a permanent basis a revised DPIA will be completed. |

1. **Systematic Description of the Envisaged Processing Operations**
   1. Create a Data Flow Diagram and attach it as Annex 1 to this DPIA.

*Example: Personal Information will be sent to the contractor in an excel document sent via an encrypted email. The contractor will then in put the data directly to the online portal. The online portal is on a sever based within the EU. Staff will sent a link to their account via their work email and passwords will have to be complex*.

* 1. Identify the data subjects:

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| Staff, Parents, Pupils |

* 1. What personal data will be processed?

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| Staff: Name, work email address, Video & images  Parent Name and email address  Pupil first name and second initial. If parents choose to post videos and images of their children it will hold this information |

* 1. What special category (sensitive) data or criminal convictions data will be processed?

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| --- |
| none |

* 1. What are the purposes and lawful grounds for processing the personal data identified above?

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| --- | --- | --- |
|  | Personal Data | Lawful basis |
| 1 | As listed above | Public task, educating children – for staff function  Parental Consent for student data |
| 2 |  |  |
| 3 |  |  |
| 4 |  |  |
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* 1. Set out the periods for retention of the personal data. This must be evidenced in a contract or privacy policy from the organisation and attached to this DPIA

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| --- |
| Per our [privacy policy](https://web.seesaw.me/privacy-policy), Seesaw permanently deletes data 60 days after deletion to prevent accidental deletion. Seesaw will also delete an account and all content associated with the account if the account has not been accessed for more than 7 years. |

* 1. Set out details of any data sharing with third parties, including sub-processors: This must be evidenced in a contract or privacy policy from the organisation and attached to this DPIA

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| Data held with in the systems is not shared with third parties. However the company do use third party data processors as listed on the their website – see attached Privacy notice <https://web.seesaw.me/privacy>. |

* 1. Set out details of any data sharing outside the EEA or with any international organisations: This must be evidenced in a contract or privacy policy from the organisation and attached to this DPIA

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| Data is held in the USA but covered by the privacy shield requirements as stated on their website <https://web.seesaw.me/privacy>. |

* 1. Set out information on where the data is held. Ie if this is Within the EEA or outside the EEA. This must be evidenced in a contract or privacy policy from the organisation and attached to this DPIA

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| --- |
| Data is held in the USA but covered by the privacy shield requirements as stated on their website <https://web.seesaw.me/privacy>. |

1. **Assessment of Risks to the Rights and Freedoms of the Data Subjects**

Consider and describe the risks to the rights and freedoms of the data subjects in the following areas:

* 1. Lawfulness of processing

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| Public Task and Consent |

* 1. Fairness and transparency of processing

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| Links to the website and privacy notice are given to parents in consent email. |

* 1. Data minimisation

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| Only first names of pupils will be used unless there are two child of the same name in a class then the second initial will be used.  In staff guidance on how to use this, staff will be instructed not to use this is a platform to discuss children’s performance or personal information with parents |

* 1. Maintaining accurate and up to date data

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| --- |
| Teachers add the current data from SIMs – this is only being used on a free trial until June so data will not need to be regularly reviewed – if this is trial is taken on a permanent basis a revised DPIA will be completed |

* 1. Ability for data subjects to opt out or object to processing

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| --- |
| Staff no  Pupils yes as we will parental consent to use this system |

* 1. Ability to respond to subject access requests

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| --- |
| Yes |

* 1. Rights of the data subjects

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| --- |
| This does not affect the rights of data subjects |

* 1. Data security

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| Staff will be instructed to use complex passwords to access the system and passwords that will not be used on other systems.  Staff will be instructed not to use this as a platform to discuss and get drawn into discussing personal data about children |

* 1. Further risks

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1. **Measures Envisaged to Address the Risks**
   1. Complete the following table using the risks identified above:

|  |  |  |  |
| --- | --- | --- | --- |
|  | Risk | Controls to be implemented | Proposed Mitigation |
| 1 | Unauthorised access to system | Staff to be informed that they must use complex passwords not used on other systems | Reduced risk |
| 2 | Functional ability for pupils to see each other’s work and videos/images | ‘Manager’ will set up all classes so that pupils cannot see each others works. Staff will be instructed not to change this setting | Reduced risk |
| 3 | Staff accidentally share peronsal information with whole class or wring parent | Staff will be instructed that they must not get drawn into conversations with parents where they are discussing personal data of their child via this platform.  Staff will be instructed not to write personal information (except name) in any comments made across the whole class or to individual parents/pupils | Reduced risk |
| 4 |  |  |  |
| 5 |  |  |  |

1. **Compliance with Guidance/Codes of Conduct**
   1. Identify any applicable guidance and/or codes of conduct issued by the Government, the ICO, the Commission or any relevant association or body:

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| --- |
| NA |

* 1. Where applicable, set out details of compliance with any relevant guidance and/or code of conduct:

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| NA |

1. **Involvement of Data Subjects**
   1. Where appropriate, seek the views of the data subjects or their representatives on the intended processing and set out the findings below:

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| Consent being sought for parents |

* 1. If the views of the data subjects have not been sought, set out the rationale below, with reference to any commercial or public interests and the security of processing operations:

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|  |

1. **DPIA Review**
   1. Identify any planned changes to the project or system and set a date to review this DPIA:

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| DPIA will be reviewed if school wish to take on a permeant use of the portal past the free trial which ends in June 2020 |

1. **Approval**

This project was assessed and its Data Protection Impact Assessment approved:

Headteacher Name:………………………………………………………………………………..

Headteacher Signtaure:…………………………………………………………………………….

Headteacher Date: ………………………………………………………………………………...

Data Protection Officer Name: ……… …………………………………

Data Protection Officer Signature:…………………………………………………………………

Data Protection Officer Date:………………………………………………………………………

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| --- | --- |
| Action | Completed |
| Privacy Notice updated | NA |
| Consent obtained from data subjects |  |
| Updated DATA Mapping Spreadsheet |  |
| Other: |  |
| Other: |  |

**Annex 1 – Data Flow Diagram**