

# **Data Protection Impact Assessment - SchoolCloud**

**Name of School: BOUNDS GREEN INFANT & JUNIOR FEDERATED SCHOOLS**

**Assessment Carried Out By: Faye Papini, School Business Manager**

**Reviewed By DPO On: Judicium Education – 16/11/2020**

## **Name and Aim of Project/Technology/System**

School Cloud Online Parent Evening Booking Software

Aims of using School Cloud Online

- To allow parents to directly book online appointments for Parents Evenings without relying on students to make appointments for them.
- To ensure parents evening can continue during the C-19 pandemic
- The aim is to increase parental engagement and satisfaction and to reduce the amount of administrative time involved in setting up and organising Parents Evenings

## **Personal Data Used by Project/Technology/System**

As a school we remain the data controller. School Cloud is the data processor.

Data is synced to the School Cloud System from the school management system SIMS as and when the school chooses. Data collected is only that necessary for the creation of parent's evening appointments and is data the school already holds.

- Student Data: first name, surname, Year group, registration group, date of birth, MIS ID
- Contact Data: title, first name, surname, relationship to student, parental responsibility to student, contact priority to student, email address, MIS ID
- Teacher Data: title, first name, surname, email address, MIS ID
- Group Data: group name, teacher, student

The data synch provides an updated data file for transfer between SIMS and SchoolCloud. The synch will automatically delete records which are no longer relevant or no longer appear in your MIS

## **Purpose of Processing**

The school's basis for processing is legitimate interest. To accurately display booking slots online for parents evening and give parents the freedom to select appointments that is convenient for them.

## **Steps taken to protect data**

### **Steps taken by the school to protect data**

- The school has downloaded the Data Protection and GDPR statements from SchoolCloud and their GDPR compliance statement – these are held on file.
- The school's Admin Team will use an extract tool to ensure that only relevant data will be synced to the Parents Evening System. This will be carried out by the Senior Admin Officer and School Business Manager only.
- Each time the sync is run, a manual check will be made that so that updates, new records and deletions will be made appropriately. SchoolCloud system assists this process as it highlights the changes since the last transfer of data for ease of checking by the Admin Team. The admin team will do a spot check on synch regularly in the event of leavers on SIMS to ensure data transfer is correct.
- The reports exported by the Admin team for teachers will only contain name, class and appointment time (no other personal details).
- If we terminate the contract we will seek confirmation that our data has been deleted from the SchoolCloud system
- SchoolCloud will only be used on school issued IT equipment which are password protected
- Staff leavers will be removed from the system promptly via regular syncs.
- All Admin staff have received training on SchoolCloud – they will have limited permissions on SchoolCloud
- All Teaching staff have been offered one to one training sessions and have been provided with written guidance/protocols to follow

### **Data security**

The selected UK data centre (UKFast.co.uk) is ISO 27001 & ISO 9001 accredited. Security staff 24/7, extensive CCTV covering the building and each aisle, intruder alarms, proximity card readers and perimeter prison fencing maintain a physical security layer to their servers.

Latest patches to servers and have multiple levels of password protection - the servers themselves and the database each are password protected. Additionally the servers are behind a redundant pair of Cisco hardware firewalls. Annual vulnerability scanning is provided by UKFast.

All data held on SchoolCloud Parents Evening is within the European Economic Area (EEA) and a rolling three months of backups are kept which are encrypted using AES-256.

School Cloud do not share this data with third-parties, though they may access this data as part of making improvements to their service or of providing support to school.

Where creating aggregated statistical data which may be derived from personal data, it will not be considered personal data as it cannot be used directly or indirectly used to identify a person.

All data held on SchoolCloud Parents Evening is within the European Economic Area (EEA). SchoolCloud do not transfer this data outside of the EEA.

SchoolCloud undertakes a commercially reasonable selection process when engaging with any third party that processes Customer Data to assess their security, privacy and confidentiality practices. SchoolCloud also ensure appropriate contractual terms are in place to ensure sub-processors meet the high standards required by SchoolCloud and applicable laws.

SchoolCloud remains fully committed to adhering to relevant data protection laws during the Brexit transition phase and will comply with any updated legislation as and when it becomes available. Once the UK has fully left the EU we will adopt the EU-approved terms for data transfer (known as the standard contractual clauses).

While SchoolCloud is based in the UK, they use suppliers outside the EEA to run our business. Customer personal data (though not end-users such as users) may be transferred outside the EEA to suppliers who demonstrate sufficient safeguards on data using one of the following legal mechanisms: the EU-U.S. Privacy Shield, or the Standard Contractual Clauses.

Emails sent to SchoolCloud are processed by Help Scout, who host their data with Amazon Web Services in their US data centres. Help Scout Inc. complies with the EU-U.S. Privacy Shield Framework. Help Scout Inc. has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles.

### **Retention**

The Parents Evening system delete personal data 30days after the termination of the license or 6months after inactivity of the trial system. They will terminate the licence 60 days after the renewal date if no payment has been received

## **Impact And Risks**

The data collected by School Cloud Parents Evening is for students, parents and staff and is only that necessary for the creation of relevant parent appointments. School Cloud has recently reviewed this to ensure this is appropriate for the service they offer. Whenever the school chooses to sync data from our MIS new data will be added, existing records will be updated and records which are no longer relevant or no longer appear in the school's MIS will be deleted.

Parents Evening System will collect pupil data which is already processed by the school. As the data will be collected from the school data management system SIMs, it reduced the risk of data loss.

Admin access to the system will be restricted to the minimum necessary persons and passwords will be kept secure.

Teacher access to the system will be password protected and they will only be able to see a subset of the data. (i.e. only that necessary for their appointments).

Parent access to the system will be using parent email address, name and date of birth of the student have to match exactly with the school's data held in SIMS in order for the parent to access it. They will only be able to access the appointment board and list of teachers. The parents evening will be attended by the parent / student as a final check by the member of staff.

<b>School Assessment of Risk</b>		
	<b>Risk Level</b>	<b>Comments</b>

	<b>(please delete appropriate )</b>	
Likelihood of harm to data subject	Unlikely	Secure portal, with limited admin access to transfer data
Severity of harm (regardless of likelihood)	Minimal	Minimal
Overall risk (taking into account measures to reduce risk above)	Low	Very limited data will be shared between SchoolCloud and the school's MIS system. The system will be managed by the Admin Team and access is limited through log in protocols. Parent details will be matched from SIMS, therefore very low risk of data breach/mis sharing of data
<b>DPO Assessment of Risk</b>		
Likelihood of harm to data subject	Unlikely	
Severity of harm (regardless of likelihood)	Minimal	
Overall risk (taking into account measures to reduce risk above)	Low	We consider the overall risk is to be low as limited data will be shared. Data is monitored by the school admin. Access by staff (is password protected) and access by parents are validated with email address, student name and student date of birth.

### **Compliance Statement**

I can confirm that this data protection impact assessment has been completed to the best of my knowledge and that Sound Cloud complies with the data protection principles under the GDPR. All privacy risks and solutions have been considered and represent a proportionate response to the identified risks to personal data.

**Signed:**



**Date: 10<sup>th</sup> November 2020**

### **DPO Statement**

I can confirm that I have reviewed the DPIA above and are satisfied that the school have taken appropriate and proportionate steps to protect the data.

**Signed: Emma Gray**

**Date: 16<sup>th</sup> November 2020**

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