

Blackboys C.E. School  
School Lane  
Blackboys  
Uckfield  
East Sussex  
TN22 5LL



Framfield C.E. School  
The Street  
Framfield  
Uckfield  
East Sussex  
TN22 5NR

# Data Protection Impact Assessment

## Google Classroom

*In our Church of England Federation, we take strength in collaboration, yet celebrate uniqueness. As schools, we may be small, but together we develop children ready to make their mark on the world. We welcome the child yet embrace the whole family. We celebrate our rural environment yet aspire to look beyond our boundaries. We strive for knowledge and gratefully accept opportunities that come our way. We all take a pride in our Federation as we follow in Jesus's example.*

# Data Protection Impact Assessment for – Google Classroom for Google G Suite – 07/10/2020

Project Details	
Name of Project/Activity	Google Classroom for Google G Suite
Project Manager/Activity Lead	Headteachers with Andrew Huggett
Document Creation Date	28//2025

Version control	
<b>07/10/2020</b>	1.0 – Document created by school
7/10/2020	2.0 – Document reviewed by IGO
<b>14/10/2020</b>	3.0 – Document revised by school
<u>14/10/2020</u>	<u>3.1 – Document reviewed by IGO</u>

## SECTION 1 - Background

State in the text box below why a DPIA is required - see separate DPIA Guidance for examples. You may find it helpful to refer or link to other documents, such as a project proposal.

Background
<p>To evaluate the risks of sharing teachers presented resources from Google Classrooms with students from that class via Google Classroom.</p> <p>To evaluate the risk of live lessons being attended by students online and the data that may need to be shared.</p>

## SECTION 2 - Description of processing

In the table below, describe the purposes of the processing by clearly outlining the reason for data processing/sharing, including:

- The consequent benefit to service delivery
- The intended effect on individuals
- Benefits to stakeholders
- Benefits to the wider organisation
- Benefits to society

Where the purpose of processing relates to Law Enforcement, please contact your GDPR lead in school or DPO - you may be required to provide supplementary information to append to this DPIA.

Purpose of the processing
<ul style="list-style-type: none"> <li>• To allow teachers to conduct remote lessons</li> <li>• To provide remote education for students</li> </ul> <p>These are required as part of the school's public task but also to enable the school to comply with the <a href="#">Coronavirus Act 2020 Provision of Remote Education (England) Temporary Continuity Direction</a>.</p>

## Scope of Processing

Information/Data to be processed		
<b>Personal Data</b>		
Name	Yes	
Address	No	
Date of birth	No	
Gender	Yes	It will be possible to tell this from teacher name/audio.
Marital status	No	
Telephone number	No	
Email address	Yes	<u>School confirmed this will be teacher email only. Pupils will be given a username and password unique to them to</u>

		<a href="#"><u>access Google Classroom. The logins used by pupils will not have email features.</u></a>
IP address	No	
Location based data	No	
Financial information	No	
Other unique identifier	Yes	If yes, state type of unique identifier

<b>Special Category (Sensitive) Data</b>		
Racial or ethnic origin	No	If yes, state why required
Political opinions	No	If yes, state why required
Religious or philosophical beliefs	No	If yes, state why required
Trade union membership	No	If yes, state why required
Mental health	No	If yes, state why required
Physical health	No	If yes, state why required
Sexuality	No	If yes, state why required
Criminal offences	No	If yes, state why required
Genetic data	No	If yes, state why required
Biometric data	No	If yes, state why required

<b>Volume of Data to be processed</b>	
Number of people affected	<input type="radio"/> 0-20 <input type="radio"/> 21-100 <input checked="" type="radio"/> 101-1,000 <input type="radio"/> 1,001+

Frequency of data collection and use	
How often will data be collected?	Daily
How often will data be used?	Daily

## Data Flow

Describe the journey the data takes
Where possible, refer to a data flow diagram - see DPIA Guidance for an example
Outline how the personal information will flow between teams/organisations/systems etc. from collection through to deletion including: <ul style="list-style-type: none"> <li>• Teacher conducts a live lesson hosted on Google Classroom for Google G Suite. These are not recorded.</li> <li>• Recorded lessons will be put onto the Google Classroom platform for children to access at a later date.</li> <li>• Recordings shared with students belonging to class via a link through Google Classroom.</li> <li>• Data to be stored on Google Drive for within staff members account and deleted in line with school privacy policy and retention schedule.</li> </ul>

Parties involved in processing		
Outline with whom the information will be shared and why - see DPIA Guidance.		
Organisation or individual	Status i.e. Data Controller (DC) or Data Processor (DP)	Reason for processing
School	DC	To provide an education remotely
Google Inc	DP	To provide infrasture, storage and security

<b>Context of the processing</b>	
Describe the relationship with the individuals whose data will be processed	Staff and Students
How much control will the data subject have over the use of their information?	Read only access Live lessons will include video and audio from both staff and student. Staff will use pupil logins to take attendance for the session. Pre-recorded lessons will contain video and audio of the member of staff only.
Would the data subject expect their information to be used in this way?	Yes
Are the data subjects children and/or vulnerable?	Yes, they are children. There is a minimal risk for the data.
Have there been any prior concerns (public and/or internal) over this type of processing?	No
Is the processing in any way novel? Eg use of new/untested technology, an innovative new initiative not tried elsewhere.	No
Is the processing transparent or covert?	Transparent

### SECTION 3 - Consultation

In the tables below, describe when and how you will seek individuals' views of the processing and any potential risks – or justify why it's not appropriate to do so in the last of the three following tables.

<b>External stakeholders</b>		
<b>Stakeholder</b>	<b>When and how views sought</b>	<b>Impact</b>
ESCC IG Team	Email and DPIA review	Comments provided on DPIA to clarify processing.

Internal stakeholders		
Stakeholder	When and how views sought	Impact
Federation Leadership Team	Focus Group and Meeting	Comments inform GDPR and DPIA creation

## SECTION 4 – Assessment of necessity and proportionality

This section assesses in detail, compliance with Data Protection Legislation in relation to the processing of personal data outlined in the previous sections.

DPIA Compliance Checklist	
Why can the objective not be achieved without processing personal data?	Pre-recorded lessons contain voice activity of staff captured on audio.
Why can the objective not be achieved by anonymising data?	Not possible to guarantee personal data such as first name is excluded.

### Principle 1: Article 5 (1) a. Lawfulness, fairness and transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

For any processing of personal data, complete Table 1. Where processing includes special category data (see Section 2 above) also complete Table 2. Select the most appropriate legal basis that will be relied upon for the processing in the DPIA.

Table 1: Personal Data	
Legal Basis (Lawfulness)	
Consent has been (will be) obtained and maintained	No
A contract with the data subject is (will be) in place covering the processing of specified personal data	No
The school has a legal obligation to process the data	Yes

Data will be shared/processed in the vital interests of the data subject (or another individual) where there is threat to life	No
The school has statutory authority to process the data	No
Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the school	Yes

**Legal Basis (Lawfulness) – Legitimate Interest\***

\* Consult with your GDPR lead /DPO to see if this will apply – this legal basis can't be used where the school is carrying out a school activity authorised by statute or in performance of a public task or exercise of official authority vested in the school.

Necessary for the purposes of legitimate interests pursued by the school, except where such interests are overridden by the interests, rights or freedoms of the data subject.	<u>No</u>	If yes, provide justification for use
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Would the data subject reasonably expect their information to be used in this way?	Yes – Students/parents expectation that lessons move online as they are unable to attend school in person.
Is any individual likely to be damaged by processing the information? - Is there any likelihood of data subjects suffering financial loss, physical harm, significant emotional or mental pain as a result of data processing?	No
Will the proposed use of personal data infringe the right to privacy under Article 8 of the Human Rights Act? - Article 8 of the Human Rights Act includes reference to: respect for private and confidential information, respect for privacy when one has a reasonable expectation of privacy and the right to control the dissemination of information about one's private life, including photographs taken covertly	No

**Transparency**



Is processing (including sharing) transparent? How will individuals be notified about the use of their personal data?	<input checked="" type="radio"/> Yes <input type="radio"/> No	School Privacy Notice and individual letter with usernames and passwords
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<b>Consent</b>	
If consent is required to process personal data, how will this be collected and what happens if consent is withheld or withdrawn?	n/a as consent not being used as the lawful basis.

**Principle 2: Article 5 (1) b. Purpose limitation**

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Are all the purposes for processing personal data covered here?	Yes
Has any personal data been obtained for one purpose and then will be used for a new different purpose in this project?	No

**Principle 3: Article 5 (1) c. Data minimisation**

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Is the data being processed limited to the minimum required to fulfil the purpose?	Yes	<i>Share recordings with select class only. The pre-recorded lessons recordings will include audio of member of staff only.</i>
Is the data being processed of adequate quality to fulfil the purpose?	Yes	
Is more data than is required being shared with any 3rd party?	No	

**Principle 4: Article 5 (1) d. Accuracy**

Personal data shall be accurate and, where necessary, kept up to date; and every reasonable step must be taken to ensure that personal data that are inaccurate, having

regard to the purposes for which they are processed, are erased or rectified without delay.

How is the accuracy of any data to be processed ensured?	Processed automatically by Google when record enabled
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#### Principle 5: Article 5 (1) e. Storage limitation

Personal data shall be kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.

How long will the personal information be held for?	In line with school retention
How will information be deleted (or anonymised) when retention periods are reached?	<b>Manually deleted</b>
Do software/systems allow deletion of information in line with retention periods?	<b>No. Data deleted by year</b>

#### Principle 6: Article 5 (1) f. Integrity & confidentiality

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

What controls are in place to manage and maintain secure access to data?	Access is limited to specific users. Access to share is limited by school login. Recordings will be stored within GSuite by staff and will be shared by a link within Google classroom.
How can we evidence that anyone who will have access to the personal data complies with the appropriate IG standards?	Training and code of conduct via email for staff and students
Has an ICT security Risk Assessment been completed (where applicable) and acted upon?	<b>No</b>
Where a third party is involved in hosting and/or processing data, what measures are in place to	Google for Education complies with relevant data protection legislation and all data held on Google

ensure compliance with Data Protection Legislation?	servers is protected by industry standard security measures. Further information about Google's data protection and privacy measures are available <a href="#">online</a>
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**International Transfers**

Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Will the activity require processing, transfer, storage and/or access to personal data outside of the UK?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Although data stored on Google servers may be stored outside the EU, GSuite have confirmed (in this <a href="#">video</a> ) that they have appropriate standard contractual clauses in place to ensure this data is kept secure in compliance with the GDPR.
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**Data Subject Rights**

See DPIA Guidance for information on types of data subject requests and legal requirements regarding response to requests.

<b>How will the systems/processes allow ease of response to requests to exercise the data subject rights below?</b>	<b>Response</b>
Subject Access Right	If personal data relating to staff is included in a lesson recording then this could be releasable in response to a SAR. However, the personal data included is likely to be very limited and it may be that the recordings would be exempt if it is not possible to remove/redact third party data. The school would seek advice from their DPO if this situation arose.
Right to Erasure	The right to erasure is not an absolute right, for example it may not apply in this scenario if the school can demonstrate that any personal data is required in order for the school to comply with a legal obligation or carry out a public task. However, the school should delete lesson recordings containing personal data if

	they were not required in order to fulfil the above. Again DPO advice would be sought if this situation arose.
Right to Object	This right does not apply here as the lawful basis being used is not consent.
Right to Portability	N/A
Right to Rectification	N/A
Right to Restriction	Potentially a data subject could request that access to a recording, if it contained their personal data, be restricted. As with the right to erasure this is not absolute so if the school is required to process this data based on a legal obligation or to carry out a public task then this would not apply. The school would seek DPO advice if this situation arose.

Where automated decisions including profiling are being made, will provision be made to allow data subjects to exercise their right to object?	No automated decision making will be carried out.
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## SECTION 5 - Assessment of Risk

See DPIA Guidance on how to complete the following table.

Risk	Likelihood of harm	Impact (severity of harm)	Overall risk score	Mitigation	Residual risk score where mitigation is in place
Recordings been shared with select students are copied and shared online	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low	Only staff and students with school G Suite accounts have access to data	<input type="radio"/> High <input checked="" type="radio"/> Medium <input type="radio"/> Low

<p>Parent complains of content been shared with other students\parent</p>	<p><input type="radio"/> High  <input checked="" type="radio"/> Medium  <input type="radio"/> Low</p>	<p><input type="radio"/> High  <input checked="" type="radio"/> Medium  <input type="radio"/> Low</p>	<p><input type="radio"/> High  <input checked="" type="radio"/> Medium  <input type="radio"/> Low</p>	<p>As no pupil data will be included in lesson recordings (as they will be pre-recorded) this risk is now very low.</p>	<p><input type="radio"/> High  <input type="radio"/> Medium  <input checked="" type="radio"/> Low</p>
<p>Processing more personal data than required</p>	<p><input type="radio"/> High  <input checked="" type="radio"/> Medium  <input type="radio"/> Low</p>	<p><input type="radio"/> High  <input checked="" type="radio"/> Medium  <input type="radio"/> Low</p>	<p><input type="radio"/> High  <input checked="" type="radio"/> Medium  <input type="radio"/> Low</p>	<p>Decision taken to include minimum personal data in recordings to be shared (i.e. pre-recorded sessions only to ensure no pupil data is included)</p>	<p><input type="radio"/> High  <input type="radio"/> Medium  <input checked="" type="radio"/> Low</p>
<p>Under the 'People' tab, students can view the name and photos of teachers and other students in their class.</p> <p>Also, if we choose to turn on contact sharing, students can view the email addresses of teachers and other students.</p>	<p>Medium</p>	<p>Low</p>	<p>Medium</p>	<p>NOT turned on contact sharing, as don't consider this as necessary and data protection risk of sharing pupils email addresses.</p> <p>Sharing of pupils names judged as low / no risk.</p> <p>Photos not generally used or encouraged by school.</p>	<p>Low</p>

## SECTION 6 – Sign off

		<b>Authorisation required by GDPR lead in school / Head Teacher / DPO.</b>  <b>For residual risks that score ‘high’, DPO approval must be obtained, who will decide whether there is a need for approval by the ICO.</b>	<b>Authorised by</b>
Is data collection/sharing proposed lawful, appropriate and not excessive?	<input checked="" type="radio"/> <b>Yes</b> <input type="radio"/> <b>No</b>	Headteacher	G Sullivan
Have all reasonable steps been planned or taken to minimise risk and enhance confidentiality?	<input checked="" type="radio"/> <b>Yes</b> <input type="radio"/> <b>No</b>	Headteacher	G Sullivan
Residual risks approved?	<input checked="" type="radio"/> <b>Yes</b> <input type="radio"/> <b>No</b>	Headteacher	G Sullivan