

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



Framfield C.E. School
The Street
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Data Protection Impact Assessment

NumBots

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 (DPIA) – Numbots– Maths Circle

Information processing/sharing proposal

1. This is a new programme software which we wish to start with our pupils and it is requesting personal information from staff and pupils.
2. <https://www.numbots.com> is the website hosting the programme. Numbots programs are designed to help students of all abilities learn key addition and subtraction facts and recall with increasing speed.

The programme can be personalised by the teacher, home learning can be set and pupils play against other pupils to improve their scores.

Purpose(s) of the information/data processing/sharing

Numbots uses the Personal Data to provide us with access to the contents of the Numbots website under the domain name <https://www.numbots.com>. The information Numbots collects about students is used to build a profile of their educational requirements and used within the Numbots platform to direct their learning and maximise the effectiveness of the program. Educational data is kept and not sold or knowingly divulged to advertisers or any external third parties.

Please also see <https://numbots.com/gdpr/>

Information/Data to be processed

Staff:

- First Name

- Surname
- Organisation name
- School Email Address
- Username
- Password
- Activity and results
- Email communications
- Telephone communications - admin only
- Internet Protocol (IP) address and browser information

School:

- Organisation name (schools, colleges and other organisations only)
- Billing Address
- Email Address
- Telephone number
- Class names
- VAT number
- Invoices
- Email communications
- Telephone communications
- Internet Protocol (IP) address and browser information

Pupils:

- First Name
- Surname
- Year group
- Username
- Password

- Activity and results

Year Groups Using it:

Reception

Year 1

Year 2

Parties involved in processing

Numbots exists to serve educators, parents and students and strives to provide a safe, positive experience for children. To ensure this, we adhere to the following policies:

- Numbots is committed to maintaining a high level of online safety for children, parents and teachers. Numbots does not allow third-party companies to advertise through their platform and will not sell data to any advertisers or 3rd party companies.
- Numbots personal information is uploaded and stored on 3rd party servers – Hetzner servers based in Germany, and (back up servers) located in Finland. Data is encrypted in transit and at rest and their team uses secure passwords and keys to keep data safe.
- Maths Circle (Numbots) uses Cookies only to the limited extent of recognising and pairing the registrant to their previous login details. However, this information is not linked to any personal information and cannot share any personal information.
- Numbots have created a Data Retention Policy to outline how long we will store and hold any personal data. This data will be held for as long as access to the site is required by the user or administrator of users.

Data Flow

The data will be uploaded via a CSV file downloaded from SIMS. This CSV will only contain requested information for requested year groups and no additional data (in accordance with the data minimisation principle under the GDPR). This information will then be stored in the Numbots servers for the duration specified within their retention period, or until the school requests that it is deleted.

Consultation

We will be notifying parents that we have set their child up as a user on the site and will be providing parents with a copy of their child's username and password for use at home.

DPIA Checklist

Why can the objective not be achieved without processing personal data?	The pupils need to be able to log in to the programme to receive a personalised programme and cannot do this without setting up an account.
Why can the objective not be achieved by anonymising data?	The program is personalised so that pupil and the teacher needs to be able to track their individual progress.

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

Is there a clear and legitimate purpose for processing the information (Is the processing justified)?	Yes
What legal condition for processing (inc. sharing) applies?	Public task
Is processing (inc. sharing) fair?	Yes
What risk does the data processing pose – is any individual likely to be damaged by processing the information?	No, because Numbots anonymise personally identifiable data where possible and appropriate and the personal data being shared is very low risk (name, school and class only). DOB is optional.
What risk does the data processing pose – is any individual likely to object?	No
What risk does the data processing pose – might it undermine individual trust in the organisation?	None. This type of processing would be within the reasonable expectation of parents.
Is processing (inc. sharing) transparent? How will individuals be notified about the use of their personal data?	We will be notifying parents that their child has an account with Numbots and provide each parent with a password and username for their child.

	Numbots have a clear privacy policy available online: http://ttrockstars.com/privacy
Are amendments required to privacy notices?	No
If consent is required to process personal data, how will this be collected and what happens if consent is withheld or withdrawn?	Numbots has a clear privacy policy which is displayed wherever personal data is captured. The privacy policy details the data collected and how it is used. All parents will be notified of their child's account and their username and password. If a parent does not want their child to access Numbots then the child can be removed from the system. Similarly, if a child moves school their details will be deleted once they are off-rolled.
Will the proposed use of personal data infringe the right to privacy under Article 8 of the Human Rights Act?	No

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; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation')

Are all the purposes for processing personal data covered here?	Yes
Have any potential new purposes for processing data been identified?	No

Principle 3: Article 5 (1) c. DATA MINIMISATION

Personal data shall be adequate, relevant and limited to what is

necessary in relation to the purposes for which they are processed ('data minimisation')

Is the data being processed limited to the minimum required to fulfil the purpose?	Yes
Is the data being processed of adequate quality to fulfil the purpose?	Yes
Is more data than is required being shared with any 3 rd party?	No

Principle 4: Article 5 (1) d. ACCURACY

Personal data shall be accurate and, where necessary, kept up to date; 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 ('accuracy')

How is the accuracy of any data to be processed ensured?	It is uploaded by CSV file so the school decides what information is shared. There is no risk of other data being shared.
If procuring new software, does it allow data to be amended when necessary?	Yes

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; (see also Article 89 (1))

What retention periods are in place for the personal data being processed?	Numbots has an updated Data Retention policy. Data will be held for as long as a user requires access to the site. This data will be deleted once a user is deleted. The school will request that data
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	is deleted about each cohort as they complete their time at the school (e.g. during transition to secondary)
Is software being procured that will allow deletion of information in line with retention periods?	Yes
If software/a system is being purchased, does it allow deletion of personal data?	Yes

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 ('integrity and confidentiality')

Can we be sure that anyone who will have access to the personal data complies with appropriate IG standards?	<ul style="list-style-type: none"> • Maths Circle Ltd – contracts of employment contain confidentiality clauses in the context of customer's data privacy. • Staff at EXAMPLE school have undertaken data protection training and the school has an information governance framework in place.
Has an IT&D security Risk Assessment been completed (where applicable) and acted upon?	Not required
Are all systems to be used secure e.g. PSN compliant?	<p>Numbots anonymise personally identifiable data where possible and appropriate.</p> <p>Numbots have implemented total database encryption across our learning platform.</p> <p>Numbots have provided additional information about how they comply with GDPR and the relevant legislation through their website - https://numbots.com/wp-content/uploads/2019/09/GDPR-FAQs-June-2019.pdf</p>

Do any new systems provide protection against any identified security risks?	Yes
What training and instructions are in place to ensure that staff know how to process personal data securely?	Data will be uploaded by a member of staff at EXAMPLE school with appropriate data protection training. This risk assessment will be shared with staff.

Data Transfers

Personal data shall not be transferred to a country or territory outside the European Economic Area 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 transfer of data outside of the EEA?	No
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Data Subject Rights

Will the systems/processes being put in place allow ease of response to data subject requests?	Yes
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Protection solutions

[For any risks identified above, use the table below to document these and any solutions/mitigation]

Risk	Solution(s)	Evaluation*
Personal data held by school shared with third party processor	Appropriate technical and organisational measures in place by data processor to protect data (e.g. CSV file sent securely)	Yes
Personal data being processed for a new purpose	Minimum required information being processed and within reasonable expectations of data subjects that data will	Yes

	be used in this way. Parents will also be notified of the new processing when login details are provided.	
Personal data accessible through new online system	Pupils given individual login details so only they can access their information. Pupil data included within the system is limited to the minimum required to reduce the risk.	Yes

*Evaluation – is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?

Sign off

	YES/NO	Authorised By
Is data collection/sharing proposed lawful, appropriate and not excessive?	Yes	G Sullivan
Have all reasonable steps been planned/taken to minimise risk and enhance confidentiality?	Yes	G Sullivan