

# Seesaw

## *Data Protection Impact Assessment*



Organisation Name/Data Controller Name: St Mary's Catholic Primary School

Date final DPIA issued 20/04/2020

### **Project Brief**

SeeSaw is an online system to set learning activities for pupils to access and gain evidence for assessment. We will also use Seesaw to improve communication between school and home, teachers and pupils

### **Who is involved in this project?**

Class teachers  
School administrator/School Business Manager  
Head Teacher  
Veritau Ltd  
Schools ICT

**Project Manager/Owner:**

Name:	<b>Mrs H. Jellett</b>
Job Title:	<b>Class teacher</b>
Service:	<b>St. Mary's Catholic Primary School</b>
Telephone:	<b>01757 706616</b>
Email:	<b>hjellett@st-marys-selby.n-yorks.sch.uk</b>

**Information Asset Owner/s:**

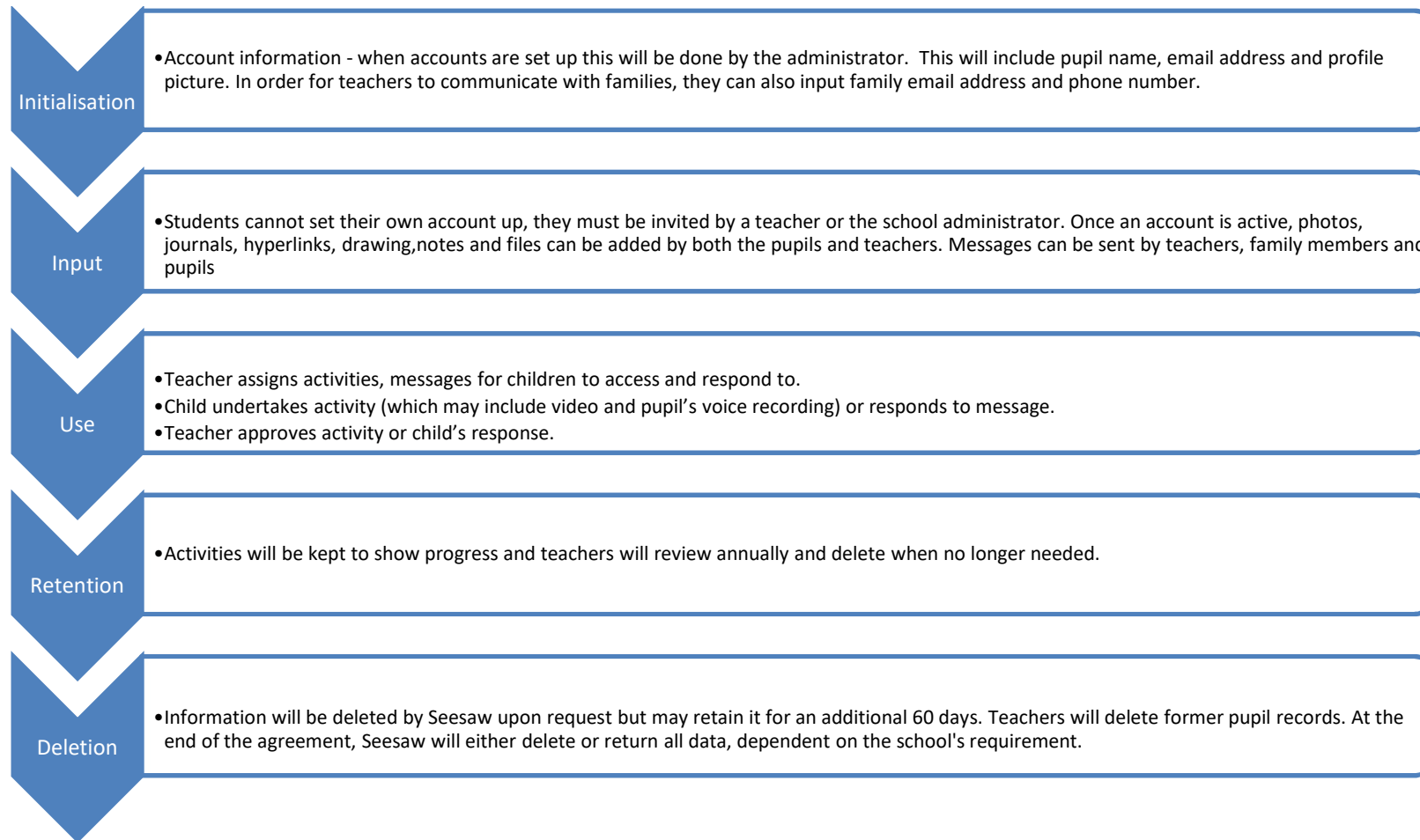
Name:	<b>Mrs F. Robertson</b>
Job Title:	<b>Headteacher</b>
Service:	<b>St. Mary's Catholic Primary School</b>
Telephone:	<b>01757 706616</b>
Email:	<b>headteacher@st-marys-selby.n-yorks.sch.uk</b>

**System Administrator/ICT Contact (if applicable):**

Name:	<b>Mrs H. Jellett</b>
Job Title:	<b>Class teacher</b>
Service:	<b>St. Mary's Catholic Primary School</b>
Telephone:	<b>01757 706616</b>
Email:	<b>hjellett@st-marys-selby.n-yorks.sch.uk</b>

## PART ONE – INFORMATION FLOW

*The collection, use and deletion of personal information should be described here. Please use a flow diagram or another visual way of explaining information flows.*



## PART TWO – PRIVACY RISKS QUESTIONNAIRE

- ❖ *This should be filled out during consultation between the Project Officer(s) and Data Protection Officer.*
- ❖ *Risks should be associated with the Principles of the General Data Protection Regulation (GDPR).*
- ❖ *You only need to consider risks arising from any new procedures and/or solutions.*

Privacy Issue	Comments	Risk (Y/N) Address in Part Three																																												
<b>General</b>																																														
Have you identified the Information Asset Owner?	Headteacher	<b>N</b>																																												
How many individuals will be affected by this project?	All pupils	<b>N</b>																																												
Who are the Data Subjects? (Split out by category)	Pupils and parents, staff	<b>N</b>																																												
Please select any information that will be processed:	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;"></th> <th style="width: 50%;">Personal Identifiers/information</th> <th style="width: 10%;"></th> <th style="width: 30%;">Special Category / Criminal</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/></td> <td>Name</td> <td><input type="checkbox"/></td> <td>Sex life</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Address/Postcode</td> <td><input type="checkbox"/></td> <td>Sexual Orientation</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Date of Birth</td> <td><input type="checkbox"/></td> <td>Religion</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Telephone Number/Email</td> <td><input type="checkbox"/></td> <td>Philosophical belief</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Emergency contact details</td> <td><input type="checkbox"/></td> <td>Political opinion</td> </tr> <tr> <td><input type="checkbox"/></td> <td>National Insurance Number</td> <td><input type="checkbox"/></td> <td>Trade Union Membership</td> </tr> <tr> <td><input type="checkbox"/></td> <td>NHS Number</td> <td><input type="checkbox"/></td> <td>Ethnic Origin</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Gender</td> <td><input type="checkbox"/></td> <td>Medical history details</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Images (photo/film)</td> <td><input type="checkbox"/></td> <td>Physical health information</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Pseudonymised information</td> <td><input type="checkbox"/></td> <td>Mental health information</td> </tr> </tbody> </table>		Personal Identifiers/information		Special Category / Criminal	<input checked="" type="checkbox"/>	Name	<input type="checkbox"/>	Sex life	<input type="checkbox"/>	Address/Postcode	<input type="checkbox"/>	Sexual Orientation	<input type="checkbox"/>	Date of Birth	<input type="checkbox"/>	Religion	<input type="checkbox"/>	Telephone Number/Email	<input type="checkbox"/>	Philosophical belief	<input type="checkbox"/>	Emergency contact details	<input type="checkbox"/>	Political opinion	<input type="checkbox"/>	National Insurance Number	<input type="checkbox"/>	Trade Union Membership	<input type="checkbox"/>	NHS Number	<input type="checkbox"/>	Ethnic Origin	<input type="checkbox"/>	Gender	<input type="checkbox"/>	Medical history details	<input checked="" type="checkbox"/>	Images (photo/film)	<input type="checkbox"/>	Physical health information	<input type="checkbox"/>	Pseudonymised information	<input type="checkbox"/>	Mental health information	<b>N</b>
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	<input type="checkbox"/>	IP addresses	<input type="checkbox"/>	Genetic/Biometric (eg. Thumbprint)	
	<input checked="" type="checkbox"/>	Other (please state): possible voice recordings	<input type="checkbox"/>	Criminal conviction information	
How will the personal data be collected?	Other (please state)				<b>N</b>
	Other: Pupil first names to be used taken from class lists to populate information to set up accounts.				
Does this processing include data matching, automated decision making or profiling? (please specify)	No				<b>N</b>
<b>Lawfulness, Fairness, and Transparent</b>					
What is the lawful basis for processing personal information? If you are using more than one condition please specify which condition relates to specific data. (Please speak with your DPO about this)	e) Public Task (specify)		Choose an item.		<b>N</b>
	Specify: The school is using this software in its official purpose to improve the education of its students (Education Regulations 2005)				
	If Legitimate Interests/Public Interest Assessment (see guidance), is completed please add:				
If you are processing Special Category Information (highlighted in red above), what is the lawful basis for processing this information (Please speak with your DPO about this)	Choose an item.		Choose an item.		<b>N</b>
	Basis in law and schedule (if applicable)/specify:N/A				
If you are processing Criminal conviction information what is the Article 10, Schedule 1 condition? (Please speak with your DPO about this)	Choose an item.				
	N/A				

If you are using consent how are you collecting this and how will people be able to withdraw their consent?	Not relying on consent		<b>N</b>
How will you tell people about this processing?	Privacy Notice – Location – <a href="https://www.st.marys.selby.n-yorks.sch.uk">https://www.st.marys.selby.n-yorks.sch.uk</a>		<b>N</b>
Do you need to update your privacy notices?	<input checked="" type="checkbox"/>	Yes	<b>Y</b>
	<input type="checkbox"/>	No	
<b><i>Purpose Limitation</i></b>			
Are you going to use information you already hold about individuals for a purpose it is not currently used for?	<input type="checkbox"/>	Yes, please specify why it is currently held and under which legal basis:	<b>N</b>
	<input checked="" type="checkbox"/>	No Same legal basis and purpose, DPIA necessary as data processor.	
Have you identified all of the purposes for which you will use personal information?	<input checked="" type="checkbox"/>	Yes we have decided to use the system to communicate as well as set work from the start, rather than add this feature in later	<b>N</b>
	<input type="checkbox"/>	No. If no, why not?	
Will people expect their information to be processed in this way?	<input checked="" type="checkbox"/>	Yes	<b>N</b>
	<input type="checkbox"/>	No, please give details:	
<b><i>Data Minimisation</i></b>			
How will you ensure you are only collecting information that is relevant to this specific purpose?	Data is restricted to only that necessary to operate the system.		<b>N</b>
Have you considered what information you could disregard without compromising the project?	<input checked="" type="checkbox"/>	Yes, please detail if any has been removed: Teachers can choose whether students or family members can download the information to another device.	<b>Y</b>
	<input type="checkbox"/>	No	

<b>Accuracy</b>			
How are you going to ensure that the personal information will be kept accurate and up to date?	Information will be input based on what is already held in school. Annual checks for data accuracy are already carried out. Parent or teacher can update the information associated with their Seesaw account directly by logging into their Seesaw account and viewing the Account Settings tab on their profile. If parents want to correct, edit, download, or update information about a student, this can be done by a teacher		<b>N</b>
If you are procuring new software does it allow you to amend and / or delete information when necessary? <i>(Consult IT as necessary)</i>	<input checked="" type="checkbox"/>	Yes	<b>N</b>
	<input type="checkbox"/>	No	
	<input type="checkbox"/>	N/A	
<b>Storage Limitation / Records Management</b>			
How long will the information be kept for? (retention period)	While the child remains at school		<b>N</b>
Are you procuring software that will allow you to delete information in line with your retention periods? <i>(Consult IT as necessary)</i>	<input checked="" type="checkbox"/>	Yes	<b>N</b>
	<input type="checkbox"/>	No, if no why not?	
	<input type="checkbox"/>	N/A	
What method will be used, to securely destroy paper and/or electronic records? <i>(Consult IT/processor as necessary)</i>	The teacher will go into records at the end of the academic year and delete as required, using class lists to ensure all accounts are captured. This will be recorded on the destruction log. If an account remains inactive for 7 years, this will be deleted by Seesaw		<b>Y</b>

Will destruction be certificated or added to a destruction log?	<input checked="" type="checkbox"/>	Yes, please specify: all batch deletions will be recorded on the destruction log	<b>N</b>
	<input type="checkbox"/>	No, if no why not?	
Where will information be stored/accessed?	Cloud based application		<b>N</b>
	Other (specify):		
If you are using a 'Cloud Based' system to store or transfer information, where is the geographical location of the server/s? <i>(you may need to ask your provider to supply this)</i>	Yes – Servers located in US. Seesaw use AWS which may be anywhere in the world. AWS are contractually bound by the GDPR		<b>Y</b>
If back up information is stored off-site, where is the geographical location?	Information stored by Seesaw which uses AWS. Where these servers are based is not specified by Seesaw. AWS is GDPR compliant however.		<b>Y</b>
<b>Security</b>			
Who will have access to the information within the organisation?	Roles: Administrator and class teacher will have access to all information.  Pupils and teachers have access to upload information to accounts		<b>N</b>
What controls have been put in place to limit access to the information?	Pupils cannot set up their own accounts, they must be invited to join		<b>N</b>
If you are implementing a new system, does this system have the ability to audit access (audit trails)?	<input checked="" type="checkbox"/>	Yes	<b>Y</b>
	<input type="checkbox"/>	No	
	Unknown at this stage		
Does your new system/hardware/procedure provide adequate protection against security	<i>e.g. encryption, two factor authentication, lockable/fire proof storage/updated policies</i> Seesaw uses access-controlled data centers, routine 3rd party security audits, restricted employee access to user information, data encryption		<b>N</b>



risks? Please detail. <i>(Consult IT as necessary)</i>	in transit and encryption of Journal Content at rest. Teachers control what is shared and with whom. Unless teachers choose to share, no student work is visible outside of the classroom. Teachers can choose to invite family members to see the work their child has added to Seesaw or post some items more publicly		
Are staff undertaking any additional training to help use new systems/procedures? Will this include Data Protection training?	<input checked="" type="checkbox"/>	Yes (please give details) Staff will be trained how to use the system and roll this out to pupils	<b>N</b>
	<input type="checkbox"/>	No. If no why not?	
Is there a disaster recovery plan in place in case of equipment/software failure? <i>(you may need to ask your provider to supply this)</i>	<input type="checkbox"/>	Unable to find details	<b>Y</b>
	<input type="checkbox"/>	No	
<b>Data Processors – Data Processors should be listed after part 2 of this form</b>			
If you are using a data processor, how has the provider demonstrated an adequate level of information security? <i>(you may need to ask your provider to supply this)</i>	Security information included in the ‘about’ section on the Seesaw Help Centre section of the website		<b>N</b>
If using a data processor, how has the provider demonstrated that they are compliant with GDPR? <i>(you may need to ask your provider to supply this)</i>	The processor is signed up to the privacy shield. They very clearly state that they, and any subprocessors will abide by the requirements of GDPR		<b>N</b>
If using a data processor, do you have a written contract in place with GDPR clauses?	<input type="checkbox"/>	Yes (please attach)	<b>Y</b>
	<input type="checkbox"/>	No	
	<input checked="" type="checkbox"/>	Not yet	

<b>Information Sharing – Data Controllers should be listed after part 2 of this form</b>			
What is the legal basis for sharing? <i>(Please speak with your DPO about this)</i>	N/A		<b>N/A</b>
Is there a sharing agreement in place? <i>(Please speak with your DPO about this)</i>	<input type="checkbox"/>	Yes (please attach)	<b>N/A</b>
	<input type="checkbox"/>	No. If no, why not?	
	<input checked="" type="checkbox"/>	N/A	
Will you transfer information outside of the UK, where will this be?	<input type="checkbox"/>	Yes, please specify where:	<b>N/A</b>
	<input type="checkbox"/>	No	
	<input checked="" type="checkbox"/>	N/A	
How will information be transferred?	e.g. email, post, secure file transfer  N/A		<b>N/A</b>
<b>Rights of the Data Subject</b>			
How will you manage 'Subject Access Requests' or other requests regarding information rights? <i>(Rectification, erasure, objection, and restriction etc.)</i>	Assistance by data processor stipulated in DPA  System capable of search functionality  Normal procedures apply.		<b>N</b>
If procuring new system, will this allow you to fulfil the rights of the data subject mentioned above?	<input checked="" type="checkbox"/>	Yes, detail as needed: DPA specifies assistance with rights of the data subject.	<b>N/A</b>
	<input type="checkbox"/>	No	
If the project involves automated decision making do you have a process in place to facilitate human	No automated decision making.		<b>N</b>

intervention? Please detail.		
Will your data processing exclude individuals from using a service or from exercising any rights?	<input type="checkbox"/>	Yes, detail as needed:
	<input checked="" type="checkbox"/>	No
<b>Accountability</b>		
As a result of this project do you need to update any of the following?	<input checked="" type="checkbox"/>	Information Asset Register
	<input checked="" type="checkbox"/>	Policies
	<input checked="" type="checkbox"/>	Procedures
If needed, have you consulted relevant stakeholders/Caldicott Guardian/ICO? What was the outcome?	<input type="checkbox"/>	Yes, who? please add outcome details:
	<input type="checkbox"/>	No

List any Data Controllers information will be shared with (if applicable):

<b>Name:</b>	<b>St. Mary's Catholic Primary School</b>
<b>Contact Details:</b>	<b>admin@st-marys-selby.n-yorks.sch.uk</b>
<b>Name:</b>	
<b>Contact Details:</b>	
<b>Name:</b>	
<b>Contact Details:</b>	
<b>Name:</b>	
<b>Contact Details:</b>	

List any Data Processors information will be processed by (if applicable):

<b>Name:</b>	<b>Seesaw</b>
<b>Contact Details:</b>	<b>help@seesaw.me</b>
<b>Name:</b>	
<b>Contact Details:</b>	
<b>Name:</b>	
<b>Contact Details:</b>	
<b>Name:</b>	
<b>Contact Details:</b>	

## PART THREE – RISK EVALUATION

<b>Privacy Risks (from part two)</b>  Describe source of risk and potential impact on individuals, compliance and corporate risks (as needed)	<b>Impact (harm to individual)</b> minimal, some or serious <b>X</b> <b>Likelihood</b> remote, possible or probable = <b>Risk (Matrix)</b>	<b>Options to reduce or eliminate risk</b>	<b>Overall Risk</b> <b>Impact</b> (harm to individual) minimal, some or serious <b>X</b> <b>Likelihood</b> remote, possible or probable = <b>Risk (Matrix)</b>	<b>Evaluation</b> eliminated, reduced, accepted
Privacy notice does not state that you will be sharing data with a teaching app system so data subject may not be aware that this is taking place, failing to meet transparency obligation	Serious x probable  High	Privacy notice to be updated to include that the school shares information with teaching apps/systems (does not need to state which system)	Some x remote  Low	Reduced
It is possible to download data to another device which may not be subject to the same level of security	Some x possible  Medium	This can be disabled	Some x remote  Low	Reduced
<b>Destruction of records depends on human intervention which may lead to records not being destroyed in line with retention periods</b>	Minimal x Possible  Low	This can be diarised and class lists used to ensure all pupils are captured	Minimal x Remote  Low	Reduced

<b>Storage is cloud based and the locations are not specified which may lead to data being stored in less secure parts of the world</b>	Serious x Possible High	All subprocessors are contractually bound to comply with GDPR requirements	Serious x Remote Low	Reduced
<b>Documentation from Seesaw does not include information about audit trails which may mean documents are altered without authorisation</b>	Some x Remote Low	This will be checked with Seesaw. Audit trails will be switched on if the system is capable of this. If not, periodic checks of who has accessed the data will be carried out.	Minimal x Remote	Reduced
<b>Details relating to disaster recovery have not been seen which may mean data is lost in the event of an emergency</b>	Serious x Possible High	Ensure disaster recovery plans are included in the contract and ensure the school has its own contingency plan	Some x Remote	Reduced
<b>There is no contract yet which means the processor is not bound by any terms and conditions</b>	Serious x Probable High	Ensure there is a contract in place. The contract will be checked for GDPR clauses.		Eliminated
<b>IAR, policies and procedures are not updated yet, meaning users do not know how to operate the system and errors or losses may occur</b>	Some x Possible	Update all documentation and train out	Some x Remote	Reduced

Severity of impact	Serious harm	Low Risk	High Risk	High Risk
	Some impact	Low Risk	Medium Risk	High Risk
	Minimal impact	Low Risk	Low Risk	Low Risk
		Remote	Possible	Probable
		Likelihood of harm		

(Information Commissioners Office, [Risk Matrix](#))

## PART FOUR – SIGNATURES AND REVIEW

*This Data Protection Impact Assessment (DPIA) should be signed by the relevant Information Asset Owner. Should any risks be 'accepted' then consideration should be given to a senior officer countersigning the DPIA. All DPIAs should be approved by the Data Protection Officer.*

### Information Asset Owner

Name: F. Robertson  
Job Title: Headteacher  
Date: 20/04/2020  
Signature: F. Robertson

### Data Protection Officer

Name: Veritau  
Job Title: Data Protection Officer  
Date: 07/05/2020  
Signature: Veritau Ltd.

### Senior Officer/Caldicott Guardian (If Applicable)

Name:  
Job Title:  
Date: Click or tap to enter a date.  
Signature:

**REVIEW DATE: 20/04/2021 (Recommend annually)**