Tapestry

Data Protection Impact Assessment

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

Date final DPIA issued : September 2019

Project Brief and Go Live Date:

Tapestry acts as an online journal for early year's children, it gives teachers the ability to easily survey a child's progression and attainment by compiling a series of photographs, videos and written observations displaying development and interaction. Parents are invited to go on their child's learning journey with them as they can access their child's profile and add their own media and observations to it, if they so desire.

Tapestry-

- Allows easy attainment comparisons to be made against the national curriculum
- Can identify children who are above, on or below average.
- Can survey the coverage of the national curriculum
- Can ascertain a children's understanding of a particular project/subject by looking at the moments captured

A DPIA is required due to the transferring of data to a new processor and the associated privacy risks that this carries due to the volume of personal data Tapestry will hold.

Go Live Date: September 2019

Project Manager/Owner:

Name:	**Mrs F Robertson**
Job Title:	**Headteacher**
Service:	**St Mary's Catholic Primary School - North Yorkshire County Council**
Telephone:	**01757 706616**
Email:	**headteacher@st-marys-selby.n-yorks.sch.uk**

Information Asset Owner/s:

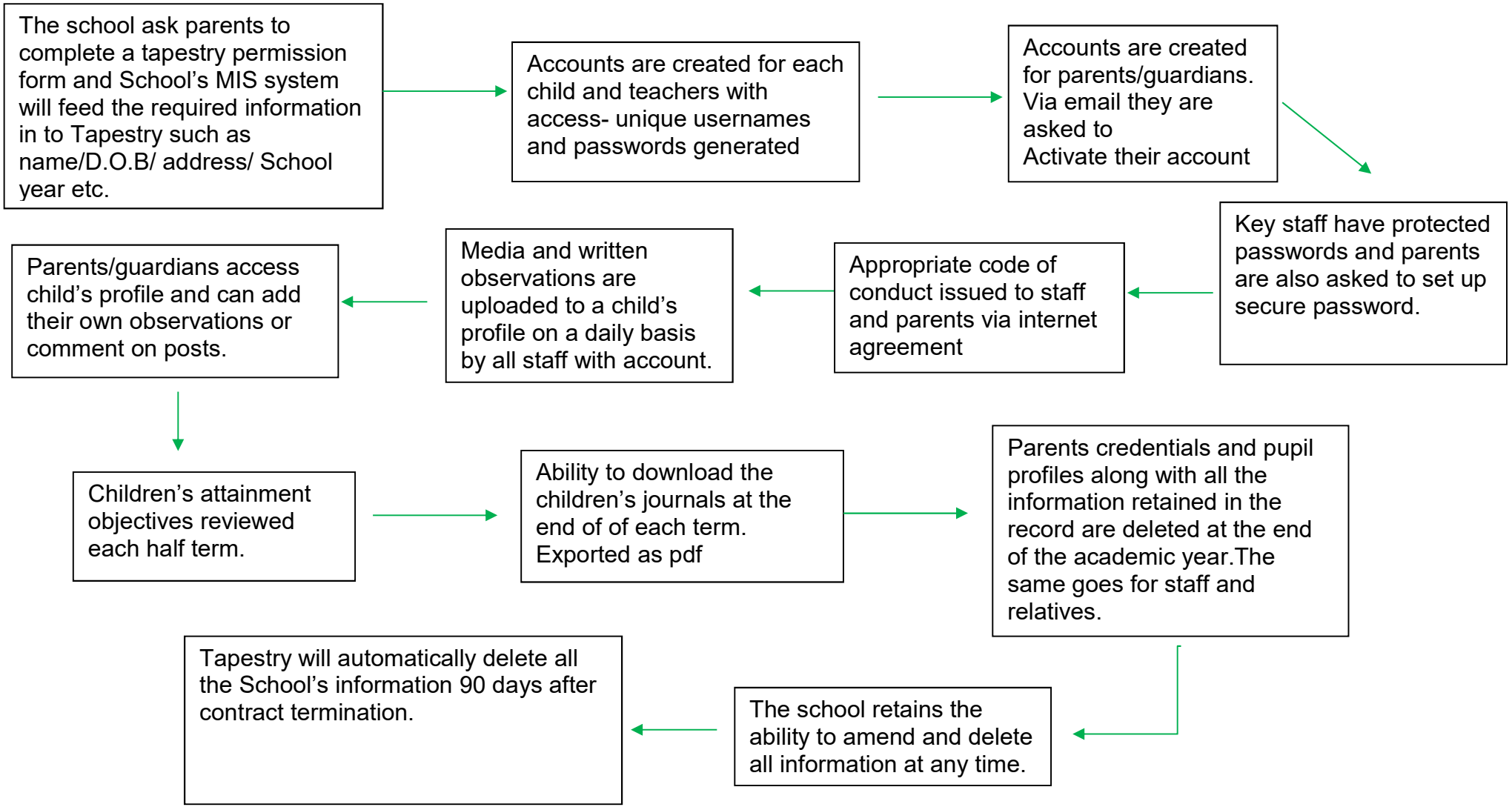
Name:	**Mrs F Robertson**
Job Title:	**Headteacher**
Service:	**St Mary's Catholic Primary School - North Yorkshire County Council**
Telephone:	**01757 706616**
Email:	**headteacher@st-marys-selby.n-yorks.sch.uk**

System Administrator/ICT Contact (if applicable):

Name:	**Mrs L Geldard**
Job Title:	**EYFS Leader**
Service:	**St Mary's Catholic Primary School – North Yorkshire County Council**
Telephone:	**01757 706616**
Email:	**lclancy@st-marys-selby.n-yorks.sch.uk**

PART ONE – INFORMATION FLOW:

The collection, use and deletion of personal information is described below in the form of a flow chart.



PART TWO – PRIVACY RISKS QUESTIONNAIRE

Privacy Issue	Comments				Is there a risk? Address in Part Three
1. General					
Have you identified the Information Asset Owner?	Yes St Mary's Catholic Primary School				☐
How many individuals will be affected by this project?	*Approximately 59*				☐
Who are the Data Subjects?	Pupils – 26 Parents -26 Staff members - 7				☐
Please select any information that will be processed:	**Personal Identifiers/information**		**Special Category**		☒
	☒	Name	☐	Sex life	
	☐	Address/Postcode	☐	Sexual Orientation	
	☒	Date of Birth	☐	Religion	
	☒	Telephone Number/Email	☐	Philosophical belief	
	☐	Emergency contact details	☐	Political opinion	
	☐	National Insurance Number	☐	Trade Union Membership	
	☐	NHS Number	☐	Ethnic Origin	
	☒	Gender	☐	Medical history details	
	☒	Images (photo/film)	☐	Physical health information	
	☐	Pseudonymised information	☐	Mental health information	
	☒	IP addresses	☐	Genetic/Biometric (eg. Thumbprint)	
	☐	Other (please state):	Y	SEN provision.	

How will the personal data be collected?	Directly from the Individual		☒
	From an Internal system.		
Does this processing include data matching, automated decision making or profiling? (please describe)	no		☐
2. Lawfulness, Fairness, and Transparent			
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)*	a) Consent	Choose an item.	☐
	If Legitimate Interests/Public Interest Assessment (see guidance), is completed please add: n/a		
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)* N/a	a) Explicit Consent	Choose an item.	☐
	Please refer to the guidance		
If you are using consent how are you collecting this and how will people be able to withdraw their consent?	Before the children start school in September permission is obtained via consent form for photographs, individual and group. An additional form is used to give consent to create a tapestry account and request email addresses etc. This has been obtained since September 2019 when we started using tapestry. A parent can withdraw consent at any time and the child's profile will be removed.		☐
How will you tell people about this processing?	A letter and email is sent prior to the start of every academic year to parents informing them of tapestry and the process and asking for consent.		☐
	☒	Yes	

Do you need to update your privacy notices?	☐	No	
3. Purpose Limitation			
Are you going to use information you already hold about individuals for a purpose it is not currently used for?	☐	Yes, please specify why it is currently held and under which legal basis:	☐
	☒	No	
Have you identified all of the purposes for which you will use personal information?	☒	Yes	☐
	☐	No. If no, why not?	
Will people expect their information to be processed in this way?	☒	Yes	☐
	☐	No, please give details:	
4. Data Minimisation			
How will you ensure you are only collecting information that is relevant to this specific purpose?	Information is collected about individual pupils to inform assessments made by staff towards the early learning goals. Observations are added and allocated to only the pupil involved in the specific learning activities. Information that is not relevant to the child's learning record for example dinner lists, is deleted and removed from journal after it has been used.		☐
Have you considered what information you could disregard without compromising the project?	☒	Yes, please detail if any has been removed:	☐
	☐	No	
5. Accuracy			
How are you going to ensure that the personal information will be kept accurate and up to date?			☒

	Staff members will remove staff or pupils accounts who leave and add new starters. If a parent changes their email address this will updated on the system to ensure accuracy.		
How are you going to ensure that the quality of the data you collect is sufficient for your intended purpose?	Staff members are aware of the EYFS curriculum and how Tapestry can be used to evidence pupils progress towards the ELGs. Observation are meaningful and evidence linked to relevant ELG. Parents are supported and encouraged to add data that is relevant to ongoing school learning.		☒
If you are procuring a new system does it allow you to amend and / or delete information when necessary? *(Consult IT as necessary)*	☒	Yes	☐
	☐	No, please give details:	
	☐	Notes can be added to the system where accuracy is disputed	
	☐	N/A	
6. Storage Limitation / Records Management			
How long will the information be kept for? (retention period)	1) Tapestry will delete information 90 days after the termination of contract but are happy to return/delete the information sooner or at any point on request. 2) If a child leaves the school their file will be deleted from the system in line with the school's retention schedule. 3) Children's accounts are exported to Parents (password protected) as they finish each academic term. In the Summer term their account is then deleted as per 1)		☐

Are you procuring a system that will allow you to delete information in line with your retention periods? *(Consult IT as necessary)*	☒	Yes	☐
	☐	No, if no why not?	
	☐	N/A	
What method will be used, to securely destroy paper and/or electronic records? (*Consult IT/processor as necessary)*	No paper records are produced. The journals are exported via pdf using the tapestry download system. This is exported each term. After the final export in July, accounts are deleted.		☐
Will destruction be certificated or added to a destruction log?	☒	Yes school can add to a destruction log.	☐
	☐	No, if no why not?	
Where will information be stored/accessed?	Cloud based application		☐
	Other (specify):		
If you are using a 'Cloud Based' system to store or transfer information, where is the geographical location of the server/s? *(you may need to ask your provider to supply this)*	EEA stored on Amazon Web Services primarily located in the Republic of Ireland.		☐
If back up information is stored off-site, where is the geographical location?	EEA-AWS in Germany.		☐
7. Security			
Who will have access to the information within the organisation?	Roles: all staff have completed Safeguarding of Personal Information training		☐

What controls have been put in place to limit access to the information?	• Unique passwords and usernames for each user. Tapestry enforces a minimum of 10 characters for passwords adding to their strength • Incorrect password attempts will result in access for that user being prevented for a period of time. Schools can choose to make accounts inactive if they suspect they have been compromised. • Access will be monitored and will be withdrawn when a staff member departs or parents access if their child leaves. • No data is stored or transported outside of the EEA, with servers in the Republic of Ireland and Germany. • Will ensure that all staff having access to personal data hold a valid Disclosure and Barring Service certificate • You can authorise certain teachers to view only some children's journal i.e. just their class. • Connections between the school and Tapestry are encrypted.		☐
If you are implementing a new system, does this system have the ability to audit access (audit trails)?	☒	Yes	☐
	☐	No	
	☐	N/A	
Does your new system/hardware/procedure provide adequate protection against security risks? Please detail. *(Consult IT as necessary)*	Yes- see above. Tapestry have started the process of becoming ISO 27001 certified and the servers they use are already certified. All transfer of information is encrypted. Tapestry run independent penetration tests to ensure the security of their systems.		☐

Are staff undertaking any additional training to help use new systems/procedures? Will this include Data Protection training?	☒	Yes (please give details) All staff have completed Data Protection training. New staff are trained to use Tapestry by Early Years Leaders	☐
	☐	No. If no why not?	
Is there a disaster recovery plan in place in case of equipment/software failure? *(you may need to ask your provider to supply this)*	☒	Yes- back up is stored in Germany which is away from the main site.	☐
	☐	No	
8. Data Processors – Data Processors should be listed after part 2 of this form			
If you are using a data processor, how has the provider demonstrated an adequate level of information security? *(you may need to ask your provider to supply this)*	Yes- Veritau completed a contract checklist and have granted Tapestry full assurance. The school have accepted this risk rating.		☐
If using a data processor, how has the provider demonstrated that they are compliant with GDPR? *(you may need to ask your provider to supply this)*	Yes- the contract is GDPR compliant and Tapestry have their own DPO appointed.		☐
If using a data processor, do you have a written contract in place with GDPR clauses?	☒	Yes (please attach)	☐
	☐	No	
	☐	N/A	
9. Information Sharing – Data Controllers should be listed after part 2 of this form			
What is the legal basis for sharing? *(Please speak with your DPO about this)*	N/A		☐

Is there a sharing agreement in place? *(Please speak with your DPO about this)*	☐	Yes (please attach)	☐
	☐	No. If no, why not?	
	☒	N/A	
Will you transfer information outside of the UK, where will this be?	☐	Yes, please specify where:	☐
	☐	No	
	☒	N/A	
How will information be transferred?	*e.g. email, post, secure file transfer*		☐
10. Rights of the Data Subject			
How will you manage 'Subject Access Requests' or other requests regarding information rights? *(Rectification, erasure, objection, and restriction etc.)*	Within the contract Tapestry confirm they will comply in aiding the school carry out SARs. The school can also remove someone's data at any time if they so request. Tapestry will be added to the IAR so it will be included in the requests made. "We will assist you in providing subject access and allowing data subjects to exercise their rights under data protection law We provide a section in the control panel where you can download a single file that brings together all the information Tapestry holds about a particular child or a particular user."		☐
If procuring a new system, will this allow you to fulfil the rights of the data subject mentioned above?	☒	Yes, detail as needed:	☐
	☐	No	
If the project involves automated decision making do you have a process in place to facilitate human intervention? Please detail.	N/A		☐

Will your data processing exclude individuals from using a service or from exercising any rights?	☐	Yes, detail as needed:	☐
	☒	No	
11. Accountability			
As a result of this project do you need to update any of the following?	☒	Information Asset Register	☐
	☐	Policies	
	☐	Procedures	
If needed, have you consulted relevant stakeholders/ICO? What was the outcome?	☐	Yes, who? please add outcome details: N/A	☐
	☒	No	

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

Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	

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

Name:	**Tapestry Online Learning Journal**
Contact Details:	**customer.service@eyfs.info**
Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	

PART THREE – RISK EVALUATION

Privacy Risks (from part two) Describe source of risk and potential impact on individuals, compliance and school risks	**Options to reduce or eliminate risk**	**Evaluation** Is the risk eliminated, reduced or accepted?
A risk that parents will inadvertently upload special category/sensitive data.	A code of conduct will be sent out to parents informing them of the expectations and suggestions of observations that are appropriate to add. A parents can add something but it needs a manager's approval before it goes live to the journal so this means if staff find anything inappropriate it can be deleted directly and the parents can be contacted to discuss this matter to ensure it doesn't happen again.E.g. just pictures of the child alone with a neutral background.	Reduced
In the event of a subject access request Tapestry is not on the records search about a data subject.	Tapestry is added to the IAR so that it is checked in the event of an SAR.	Reduced
Risk of breaking GDPR Compliance if access and accounts aren't monitored.	The information asset owner is aware of their responsibility to keep the system up to date. Key staff monitor the system on a daily basis.	Reduced
Parents are unaware of the new system.	Privacy Notice is up to date. Parents have been informed of the use of the new processor.	Eliminated
Users are unaware of what is appropriate to upload to the journal and the manner in which to comment.	An acceptable use policy is administered before the start of an academic year to ensure both staff and parents know what proper conduct of behaviour is.	Reduced

Privacy Notice has not been updated to reflect Tapestry's processing activities	The Privacy Notice has been updated in order to ensure transparency.	Eliminated
Location of the Servers being outside the United Kingdom	This will be dependent upon Brexit arrangements, the school will work with Veritau to ensure measures are taken.	Accepted

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 the school's Senior Information Risk Owner (SIRO) countersigning the DPIA if this is not the individual who has completed the DPIA. All DPIAs should be approved by the Data Protection Officer.

Information Asset Owner
Name:Mrs F Robertson
Job Title: Headteacher
Date: January 2021
Signature:

Data Protection Officer
Name: Becky Dixon
Job Title: Trainee Information Governance officer
Date: 05/02/2021
Signature: BDixon

Senior Officer (if applicable)
Name:
Job Title:
Date: Click or tap to enter a date.
Signature:

REVIEW DATE: September 2021