



## GDPR privacy notice for schools using the Online Teachers PAL

BC Education Ltd. are committed to complying with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. The GDPR comes into effect on 25 May 2018. Looking after the personal information that schools share with us is very important and we want schools to be confident that their personal data is kept safely and securely on the Online Teacher's PAL.

### Who controls and processes the information?

BC Education is the data controller for the personal data that is entered onto the Online Teacher's PAL. The school determines which personal data is entered onto the Online Teacher's PAL.

BC Education Ltd. is also the processor for the Online Teacher's PAL. We have taken all appropriate measures to ensure the security of processing and compliance with the GDPR. We do not share the data with any third party with the exception of the IT company responsible for the maintenance and security of the Online Teacher's PAL – Foolsqueek Ltd.

Foolsqueek Ltd. is the sub-processor for the Online Teacher's PAL. Although they can access data for the purposes of maintaining the Online Teacher's PAL, they do not use the data in any way and do not share the data with any other processor or third party. The same data protection standards upheld by BC Education Ltd. are also upheld by Foolsqueek Ltd.

Debs Bragard is the data protection officer for BC Education Ltd. Her role is to oversee and monitor the Online Teacher's PAL data protection procedures, and to ensure they are compliant with the GDPR. She can be contacted on 07595421642 or [debs@bced.co.uk](mailto:debs@bced.co.uk)

### Why does BC Education Ltd's Online Teacher's PAL system control and process personal data for teachers and pupils?

BC Education Ltd. controls and processes personal data relating to teachers and pupils in the school. This is data inputted by the school (usually a member of the school admin team). The data is used by the school to support planning, teaching and on-going assessment of writing.

The school is responsible for collecting pupil personal data and should adhere to UK law, in relation to:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

BC Education Ltd.'s Online Teacher's PAL controls and processes data so that the school has opportunity to:

- support planning and teaching
- support teacher assessment
- monitor and report on pupil progress
- comply with the law regarding data sharing

### What personal data is collected and how will it be obtained?

BC Education Ltd. controls and processes the following personal data about teachers/staff on the Online Teacher's PAL:

- title, name, school email address, role in school.

The school has the option to put pupil personal data onto the Online Teacher's PAL. If the school chooses to put pupil personal data on the Online Teacher's PAL, BC Education Ltd. controls and processes this information. Pupil personal data can include some or all of the following categories:

- Pupil personal information – e.g. name, date of birth, gender
- Additional pupil information – e.g. EAL, free school meal eligibility (PP), SEND (on school register for SEND), Cared For (CF)
- Pupil assessment information – e.g. ability group in class, pupil progress.

### How is the data kept secure?

BC Education Ltd. has taken all appropriate measures to ensure the security of processing and compliance with the GDPR. We protect all information through the following measures:

- Maintaining security procedures for the employees of BC Education Ltd e.g. password protected laptops and i-phones with additional encryption software
- Employing Footsqueek Ltd as a sub-processor responsible for security, data-loss prevention strategy, maintenance, management and regular testing of the security posture of the web-site
- Restricting access to personal data through log-in and password permissions e.g. a Teacher User can only access own personal data and data of their class if inputted by school
- Giving schools the right to restrict access for individual members of staff e.g. School Admin User cannot access pupil attainment.

Your school has already nominated a School Admin User for the Online Teacher's PAL who limits the amount of data sent between your school and the Online Teacher's PAL. They have the responsibility (with the approval of the Head Teacher) to:

- Create, maintain and manage an up-to-date list of current users (SMT User, Teacher User, School Admin User)
- Immediately disable an account when a user leaves the school
- Create, maintain and manage up-to-date lists of pupils, including pupil personal data (if the school elects to use this optional function).

### How long is the data stored for?

Personal data relating to teachers and pupils on the Online Teacher's PAL is stored according to the contract between BC Education Ltd. and the school. In accordance with the GDPR, the Online Teacher's PAL does not store personal data indefinitely. Data is only stored for as long as the school has a contract with BC Education Ltd. Once a contract is terminated, data will be deleted from the Online Teacher's PAL.

### Will the information be shared?

BC Education Ltd. does not share teacher or pupil personal data on the Online Teacher's PAL with any third party except for the sub-processor, Footsqueek Ltd.

### What are the school's rights?

Schools using the Online Teacher's PAL have the following rights in relation to the processing of personal data. The school has the right to:

- Request that the school's data is erased where there is no compelling reason for its continued processing.
- Where the processing of data is based on the school's consent, the school has the right to withdraw this consent at any time.

If the school has a concern about the way BC Education Ltd. processes its data on the Online Teacher's PAL, it can raise a concern with the ICO. The ICO can be contacted on 0303 123 1113, Monday-Friday 9am-5pm.

### Where can the school find out more information?

If the school would like to find out more information about the way BC Education Ltd. processes its data on the Online Teacher's PAL, please visit the BC Education Ltd. website [www.bced.co.uk](http://www.bced.co.uk) to download its GDPR Data Protection Policy.

We keep our privacy policy under regular review and we will place any updates on our website. This privacy policy was last up-dated on 11<sup>th</sup> May 2018.