

STUART BATHURST CATHOLIC HIGH SCHOOL



Data Protection Impact Assessment (G Suite)

Data Protection Impact Assessment (G Suite for Education)

Cloud computing is a method for delivering information technology (IT) services in which resources are retrieved from the Internet through web-based tools and applications, as opposed to a direct connection to a server at the school. Stuart Bathurst Catholic High School operates a cloud-based system. As such Stuart Bathurst Catholic High School must consider the privacy implications of such a system. The Data Protection Impact Assessment is a systematic process for identifying and addressing privacy issues and considers the future consequences for privacy of a current or proposed action. Stuart Bathurst Catholic High School recognises that moving to a cloud service provider has a number of implications. Stuart Bathurst Catholic High School recognises the need to have a good overview of its data information flow. The Data Protection Impact Assessment looks at the wider context of privacy considering Data Protection Law and the Human Rights Act. It considers the need for a cloud-based system and the impact it may have on individual privacy.

The school needs to know where the data is stored, how it can be transferred and what access possibilities the school has to its data. The location of the cloud is important to determine applicable law. The school will need to satisfy its responsibilities in determining whether the security measures the cloud provider has taken are sufficient, and that the rights of the data subject under the UK GDPR is satisfied by the school. Stuart Bathurst Catholic High School aims to undertake this Data Protection Impact Assessment on an annual basis.

What is the aim of the project?

(schools log into RMuNify-select the G Suite tile - land on the users G Suite page).

G Suite for Education is a suite of free Google apps tailored specifically for schools. It provides an online platform that both teachers and students can access. Google offers two distinct versions of G Suite for schools; G Suite for Education (a free product with a basic selection of apps) and G Suite Enterprise for Education (a paid version with enhanced security and apps). In this setting access to G Suite for Education is via RM Unify which in this instance is a Single Sign On means to access the G Suite for Education apps/programs environment. Stuart Bathurst Catholic High School will undertake the following processes:

- Collecting personal data
- Recording and organizing personal data
- Structuring and storing personal data
- Copying personal data
- Retrieving personal data
- Deleting personal data

By opting for a cloud-based solution the school aims to achieve the following:

- Scalability
- Reliability
- Resilience
- Delivery at a potentially lower cost
- Supports mobile access to data securely
- Update of documents in real time
- Good working practice, i.e. secure access to sensitive files

G Suite for Education

G Suite for Education is a suite of free Google apps tailored specifically for schools. They deliver value with built-in, multi-layered security, and 24/7 support at no additional cost.

G Suite for Education includes Google Classroom which enable teachers to provide feedback and track a student's progress to improve performance. It also helps teachers to manage the school curriculum, assignments and grading in one place.

Google Classroom has the ability to link with Google Drive, Google Docs, Sheets and Slides, and Gmail together to help the school achieve a paperless system. The school can invite students to classrooms through the school's ICT infrastructure, through a private code that can then be added in the student's user interface or automatically imported from a school domain.

Google Classroom supports many different grading schemes. Teachers have the option to attach files to the assignment which students can view, edit, or get an individual copy.

Students can create files and then attach them to the assignment if a copy of a file wasn't created by the teacher.

Teachers have the option to monitor the progress of each student on the assignment where they can make comments and edit.

Turned in assignments can be graded by the teacher and returned with comments to allow the student to revise the assignment and turn back in.

Once graded, assignments can only be edited by the teacher unless the teacher turns the assignment back in.

The information is held securely with regular data backed up. The network is only accessible through dedicated password linked to the school.

Google Forms is also included in G Suite for Education. This enables schools to create forms, quizzes, and surveys to collect and analyze responses.

Hangouts and Meet.

Within the G Suite for Education, there are also two separate apps/programs for webinars/online meetings and chat: Hangouts and Meet. These apps/programs have the functionality for communication via video/phone call/message (chat) or webinar. This enables teaching, learning and working from anywhere with video capabilities that can support virtual classrooms and meetings.

Contacts from in-tenancy directory and/or added from other sources such as the school's management information system can be managed through the G Suite admin function. This can include in-domain and outside-domain contacts.

G Suite Enterprise for Education

G Suite Enterprise for Education offers powerful collaboration and communication tools that help faculty, students, and administrators be more successful. G Suite Enterprise for Education includes advanced controls, enhanced analytics and search, and enterprise-grade communication tools.

G Suite Enterprise for Education delivers all the functionality of G Suite for Education, plus premium features like enhanced security tools, more control over data, and robust video meeting capabilities. This includes the following functionality:

Activity can be viewed across the school domain, security threats can be quickly addressed, with the ability to easily manage data permissions with centralized admin controls.

Enables teaching and learning from anywhere using communication tools that can accommodate larger meetings, live streaming, and recording.

Functionality to prevent, detect, and manage security incidents using a single, comprehensive dashboard.

Originality reports, available in Google Classroom and Assignments, can help students improve their writing by flagging needed citations, while also providing the school with a fast and easy way to verify academic integrity and originality. With G Suite Enterprise for Education the school gets unlimited access to originality reports.

Accessibility to enhanced support with faster response times from a dedicated team of product specialists.

G Suite core services do not contain advertising, nor do they use information in those services for advertising purposes. All G Suite for Education core services support COPPA and FERPA compliance. A comparison of the functionality between [G Suite for Education and G Suite Enterprise for Education](#) can be found at this link.

Cloud based systems enable the school to upload documents, photos, videos, and other files to a website to share with others or to act as a backup copy. These files can then be accessed from any location or any type of device (laptop, mobile phone, tablet, etc).

The cloud service provider cannot do anything with the school's data unless they have been instructed by the school. The schools Privacy Notice will be updated especially with reference to the storing of pupil and workforce data in the cloud.

Step 2: Describe the processing

The Privacy Notices (pupil and workforce) for the school provides the legitimate basis of why the school collects data.

How will you collect, use, store and delete data?

The information collected by the school is retained on the school's computer systems and in paper files. The information is retained according to the school's Data Retention Policy.

What is the source of the data?

Pupil information is collected via registration forms when pupils join the school, pupil update forms the school issue at the start of the year, Common Transfer File (CTF) or secure file transfer from previous schools. Pupil information also includes classroom work, assessments and reports. Workforce information is collected through application forms, CVs or resumes; information obtained from identity documents, forms completed at the start of employment, correspondence, interviews, meetings and assessments.

Will you be sharing data with anyone?

Stuart Bathurst Catholic High School routinely shares pupil information with relevant staff within the school, schools that the pupil attends after leaving, the Local Authority, the Department for Education, Health Services, Learning Support Services, RM Integrus and various third party Information Society Services applications.

Stuart Bathurst Catholic High School routinely shares workforce information internally with people responsible for HR and recruitment (including payroll), senior staff, with the Local Authority, and the Department for Education.

What types of processing identified as likely high risk are involved?

Transferring 'special category' data from the school to the cloud. Storage of personal and 'special category' data in the Cloud. However, in terms of using G Suite for Education no special category data will be used.

What is the nature of the data?

Pupil data relates to personal identifiers and contacts (such as name, unique pupil number, contact details and address). Characteristics (such as ethnicity, language, nationality, gender, religion, date of birth, country of birth, free school meal eligibility). Special education needs, safeguarding information, medical and administration (doctors' information, child health, dental health, allergies, medication and dietary requirements). Attendance information, assessment, attainment and behavioral information. The school also obtains data on parents/guardians/carers including their name, address, telephone number and e-mail address.

Workforce data relates to personal information (such as name, address and contact details, employee or teacher number, bank details, national insurance number, marital status, next of kin, dependents and emergency contacts). Special categories of data (such as gender, age, ethnic group). Contract information (such as start dates, terms and conditions of employment, hours

worked, post, roles and salary information, pensions, nationality and entitlement to work in the UK). Work absence information, information about criminal records, details of any disciplinary or grievance procedures. Assessments of performance (such as appraisals, performance reviews, ratings, performance improvement plans and related correspondence). Information about medical or health conditions.

Special Category data?

Some of the personal data collected falls under the UK GDPR special category data. This includes race; ethnic origin; religion; biometrics; and health. These may be contained in the Single Central Record, RM Integris, child safeguarding files, SEN reports, etc. However, in terms of using G Suite for Education no special category data will be used.

How much data is collected and used and how often?

Personal data is collected for all pupils. Additionally, personal data is also held respecting the school's workforce, Board of Governors, Volunteers, and Contractors. Data relating to sports coaches and other educational specialist is contained within the Single Central Record to ensure health and safety and safeguarding within the school.

How long will you keep the data for?

The school will be applying appropriate data retention periods as outlined in its Data Retention Policy and the IRMS Information Management Toolkit for Schools.

Scope of data obtained?

G Suite for Education relies on minimal personal data. The school will act as the administrator and will set up access to pupils within a classroom and individual setting. Personal data will include details of the class/year and the first and second name of the pupil.

The school provides education to its students with staff delivering the National Curriculum

What is the nature of your relationship with the individuals?

Stuart Bathurst Catholic High School collects and processes personal data relating to its pupils and employees to manage the parent/pupil and employment relationship.

Through the Privacy Notice (pupil/workforce) Stuart Bathurst Catholic High School is committed to being transparent about how it collects and uses data and to meeting its data protection obligation.

How much control will they have?

Access to the pupil files will be controlled by the school.

Cloud Service provider is hosting the data and will not be accessing it.

The school will be able to upload personal data from its PC for the data to be stored remotely by a service provider. Any changes made to files are automatically copied across and immediately accessible from other devices the school may have.

Do they include children or other vulnerable groups?

None of the data used in G Suite for Education will have special category data such as child safeguarding records, RM Integris, SEN records, Single Central Record.

Are there prior concerns over this type of processing or security flaws?

Does the cloud provider store the information in an encrypted format? What is the method of file transfer? For example, the most secure way to transfer is to encrypt the data before it leaves the computer. Encryption does have its limitations inasmuch as the encryption key will need to be shared with others to access the data.

Stuart Bathurst Catholic High School recognises that moving to a cloud based solution raises a number of General Data Protection Regulations issues as follows:

ISSUE: The cloud-based solution will be storing personal data including sensitive information

RISK: There is a risk of uncontrolled distribution of information to third parties

MITIGATING ACTION: Google data centers are built with custom-designed servers, running Google's own operating system for security and performance. Google has 700+ security engineers that work around the clock to spot threats early and respond quickly

Google's data centers use custom hardware running a custom hardened operating system and file system. Each of these systems has been optimized for security and performance. Google controls the entire hardware stack and is able to quickly respond to threats or weaknesses that may emerge. Google is the first major cloud provider to enable Perfect Forward Secrecy, which encrypts content as it moves between Google servers and those of other companies

Google encrypts Gmail, Attachment, and Drive data while in transit. This ensures that messages are safe not only when they move between the school and Google's servers, but also as they move between Google's data centers

ISSUE: Transfer of data between the school and the cloud

RISK: Risk of compromise and unlawful access when personal data is transferred

MITIGATING ACTION: Data is encrypted at several levels. Google forces HTTPS (Hypertext Transfer Protocol Secure) for all transmissions between users and encrypts message transmissions with other mail servers using 256-bit Transport Layer G Suite for Education services and uses Perfect Forward Secrecy (PFS) for all its services. Google also Security (TLS) and utilizes 2048 RSA encryption keys for the validation and key exchange phases. This protects message communications when client users send and receive emails with external parties also using TLS

PFS requires that the private keys for a connection are not kept in persistent storage. Anyone who breaks a single key can no longer decrypt months' worth of connections; in fact, not even the server operator is able to retroactively decrypt HTTPS sessions.

ISSUE: Security of data whilst hosted in the cloud

RISK: Risk of compromise and unlawful access when personal data is at rest

MITIGATING ACTION: Customer data that is uploaded or created in G Suite for Education services is encrypted at rest.

Google have also enabled HTTPS for all of its G Suite for Education services, including Google Classroom, Google Forms, and Hangouts and Meet so that the school data is encrypted when traveling from a school device to Google and also while in transit between Google data centers

All Google employees are required to sign a confidentiality agreement and complete mandatory confidentiality and privacy trainings, as well as a Code of Conduct training. Google's Code of Conduct specifically addresses responsibilities and expected behaviour with respect to the protection of information

ISSUE: Use of third-party sub processors?

RISK: Noncompliance with the requirements under UK GDPR

MITIGATING ACTION: Google Group companies directly conduct the majority of data processing activities required to provide the G Suite for Education and Google Cloud Platform services. However, Google do engage some third-party processors to assist in supporting these services

Each data processor goes through a rigorous selection process to ensure it has the required technical expertise and can deliver the appropriate level of security and privacy. Google make information available about Google group sub processors supporting G Suite for Education and Google Cloud Platform services, as well as third-party sub processors involved in those services, and Google include commitments relating to sub processors in current and updated data processing agreements

ISSUE: Understanding the cloud-based solution chosen where data processing/storage premises are shared?

RISK: The potential of information leakage

MITIGATING ACTION: School data is protected as if it were on its own server. Unauthorized parties cannot access school data. Other customers cannot access school data, and the school cannot access theirs. All user accounts are protected by Google's secure architecture that ensures that one user cannot see another user's data

ISSUE: Cloud solution and the geographical location of where the data is stored

RISK: Within the EU, the physical location of the cloud is a decisive factor to determine which privacy rules apply. However, in other areas other regulations may apply which may not be Data Protection Law compliant

MITIGATING ACTION: Google Cloud Platform (GCP) allows customers to choose to store their data in Europe, North America, or Asia. If applicable the school would specify this location when they configure their application to ensure compliance under UK GDPR

Google's certification under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks includes G Suite for Education and Google Cloud Platform.

Google have also gained confirmation of compliance from European Data Protection Authorities for its model contract clauses, affirming that Google's current contractual commitments for G Suite for Education and Google Cloud Platform fully meet the requirements under GDPR in terms of transfers of personal data from the EU to the rest of the world

ISSUE: Cloud Service Provider and privacy commitments respecting personal data, i.e. the rights of data subjects

RISK: UK GDPR non-compliance

MITIGATING ACTION: Google provides capabilities and contractual commitments created to meet data protection recommendations provided by the Article 29 Working Party. Google offers to sign EU Model Contract Clauses and a Data Processing Amendment for G Suite for Education and Data Processing Amendments for Google Cloud Platform

UK GDPR restricts the movement of data from the EU to non-EU countries that do not meet the EU's "adequacy" standard for privacy protection. Processing personal data strictly within the EU is a means of compliance with this regulation

ISSUE: Implementing data retention effectively in the cloud

RISK: UK GDPR non-compliance

MITIGATING ACTION: Google provide tools to make it easy for the school to take its data without penalty or additional cost imposed by Google. Administrators can export customer data in standard

formats at any time during the term of any agreement entered into by the school and Google. Google Cloud Platform customers can extract their data using industry standard tools, for which there may be charges.

ISSUE: Responding to a data breach

RISK: UK GDPR non-compliance

MITIGATING ACTION: G Suite for Education and Google Cloud Platform provide contractual commitments around incident notification for many years. Google will continue to promptly inform schools of incidents involving its data in line with the data incident terms in Google's current agreements and the updated terms that apply when the UK GDPR came into force

Google's security practices are verified and certified by third-party auditors. Google has achieved ISO 27001 certification, which means that an independent auditor has examined the controls present in its data centers, infrastructure, and operation

Amongst these practices, employees are subject to background investigations based on their level of access. Any employee access is governed by a policy of "least privilege access," which means that access is only granted to the information and resources that are necessary for the execution of the assigned task

ISSUE: Post Brexit

RISK: UK GDPR non-compliance

MITIGATING ACTION: Google Cloud Platform (GCP) allows customers to choose to store their data in Europe, North America, or Asia. If applicable the school would specify this location when they configure their application to ensure compliance under GDPR

UK GDPR data protection law applies to the processing of school information, G Suite for Education provide the controls described in [Google's Privacy Policy](#) so the school can exercise its right to request access to, update, remove, and restrict the processing of its information. The school as data controller has the right to object to the processing of its personal data information or export its information to another service

ISSUE: Subject Access Requests

RISK: The school must be able to retrieve the data in a structured format to provide the information to the data subject

MITIGATING ACTION: Data controllers can use the G Suite for Education and Google Cloud Platform administrative consoles and services functionality to help access, rectify, restrict the processing of, or delete any data that they and their users put into Google systems. This functionality will help the school fulfill its obligations to respond to requests from data subjects when exercising their rights under the GDPR

ISSUE: Data Ownership

RISK: UK GDPR non-compliance

MITIGATING ACTION: The school as data controller retains ownership of the data. G Suite for Education (Google) is the data processor

ISSUE: Cloud Architecture

RISK: The school needs to familiarise itself with the underlying technologies the cloud provider uses and the implications these technologies have on security safeguards and protection of the personal data stored in the cloud

MITIGATING ACTION: Google's application and network architecture is designed for maximum reliability and uptime. Data is distributed across Google's servers and data centers. If a machine—or even an entire data center—fails, school data will still be accessible.

Google owns and operates data centers around the world to keep the services the school uses running 24 hours a day, 7 days a week

Google's application and network architecture is designed for maximum reliability and uptime. Google's computing platform assumes ongoing hardware failure, and it uses robust software failover to withstand disruption.

All Google systems are inherently redundant by design, and each subsystem is not dependent on any particular physical or logical server for ongoing operation. Data is replicated multiple times across Google's clustered active servers so that, in the case of a machine failure, data will still be accessible through another system. Google also replicate data to secondary data centers to ensure protection from data center failures

ISSUE: Security of Privacy

RISK: UK GDPR non-compliance

MITIGATING ACTION: Google is subject to independent verification of its security, privacy, and compliance controls. In order to provide this, Google undergo several independent third-party audits on a regular basis

For each one, an independent auditor examines Google's data centers, infrastructure, and operations

ISO 27001: is one of the most widely recognized, internationally accepted independent security standards. Google has earned ISO 27001 certification for the systems, applications, people, technology, processes, and data centres that make up its shared Common Infrastructure as well as for G Suite for Education and

Google Cloud Platform

ISO 27017: is an international standard of practice for information security controls based on ISO/IEC 27002, specifically for Cloud Services. Google has been certified compliant with ISO 27017 for G Suite for Education and Google Cloud Platform

ISO 27018: is an international standard of practice for protection of personally identifiable information (PII) in Public Cloud Services. Google has been certified compliant with ISO 27018 for G Suite for Education and Google Cloud Platform

The American Institute of Certified Public Accountants (AICPA) SOC 2 (Service Organization Controls) and SOC 3 audit framework defines Trust Principles and criteria for security, availability, processing integrity, and confidentiality. Google has both SOC 2 and SOC 3 reports for Google Cloud Platform and G Suite for Education

This means that independent auditors have examined the controls protecting the data in Google's systems (including logical security, privacy, and data center security), and assured that these controls are in place and operating effectively

The school moving to a cloud-based solution will realise the following benefits:

- Scalability
- Reliability
- Resilience
- Delivery at a potentially lower cost
- Supports mobile access to data securely
- Update of documents in real time
- Good working practice, i.e. secure access to sensitive files

The views of senior leadership team and the Board of Governors will be obtained. Once reviewed the views of stakeholders will be taken into account

The view of YourIG has also been engaged to ensure Data Protection Law compliance

The lawful basis for processing personal data is contained in the school's Privacy Notice (Pupil and Workforce). The Legitimate basis includes the following:

- Childcare Act 2006 (Section 40 (2)(a))
- The Education Reform Act 1988
- Further and Higher Education Act 1992,
- Education Act 1994; 1998; 2002; 2005; 2011
- Health and Safety at Work Act
- Safeguarding Vulnerable Groups Act
- Working together to Safeguard Children Guidelines (DfE)

The school has a Subject Access Request procedure in place to ensure compliance with Data Protection Law

The cloud-based solution will enable the school to uphold the rights of the data subject? The right to be informed; the right of access; the right of rectification; the right to erasure; the right to restrict processing; the right to data portability; the right to object; and the right not to be subject to automated decision-making?

The school will continue to be compliant with its Data Protection Policy

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Data Transfer	Secure network, end to end encryption	Eliminated reduced accepted Reduced	Low medium high Medium	Yes/no Yes
Asset protection & resilience	Data Centre in EU, Certified, Penetration Testing and Audit	Reduced	Medium	Yes
Data Breaches	Where applicable documented in contract and owned by school	Reduced	Low	Yes
Post Brexit	Contingency plans in place	Reduced	Low	Yes
Subject Access Request	Technical capability to satisfy data subject access request	Reduced	Low	Yes
Data Retention	Implementing school data retention periods in the cloud	Reduced	Low	Yes

Item	Name/date	Notes
Measures approved by:	Richard May	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Richard May	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Yes	DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>Summary of DPO advice:</p> <p>Schools should be aware that there is G Suite for Education (a free version of the platform) and G Suite Enterprise for Education (a paid version with enhanced security). Premium features include enhanced security tools, more control over data, and robust video meeting capabilities.</p>		
<p>DPO advice accepted or overruled by:</p> <p>If overruled, you must explain your reasons</p>		
<p>Comments:</p>		
<p>Consultation responses reviewed by:</p> <p>If your decision departs from individuals' views, you must explain your reasons</p>		
<p>Comments:</p>		
<p>This DPIA will kept under review by:</p> <p style="text-align: right;">Alicia Mortimer</p> <p>The DPO should also review ongoing compliance with DPIA</p>		