

Microsoft Teams

Data Protection Impact Assessment



Organisation Name/Data Controller Name: North Stainley CofE Primary School

Date final DPIA issued Click or tap to enter a date.

REF (if applicable)

Project Brief and Go Live Date:

In order to facilitate the learning of students in the school at a time when remote learning is becoming more prominent and necessary, a system for live streaming and recording lessons is required. Microsoft Teams allows for private “locked classrooms”, in which students and teachers can contribute to lessons through microphones, video and messaging. It also allows for written communication and sharing of documents and notes. This interaction is beneficial for students who cannot physically come into school during the COVID-19 (Coronavirus) pandemic.

It also allows for lessons, meetings and calls to be recorded where required for playback to students at a later date. This allows for students to learn at their own pace, and to enable certain learning techniques.

A DPIA is required due to the sharing of data with an external processor, and the potential privacy risks associated with filming people while they are at home.

Go live date: 7/1/2021

Project Manager/Owner:

Name:	Louise Wallen
Job Title:	Headteacher
Service:	
Telephone:	01765635276
Email:	Headteacher@northstainley.n-yorks.sch.uk

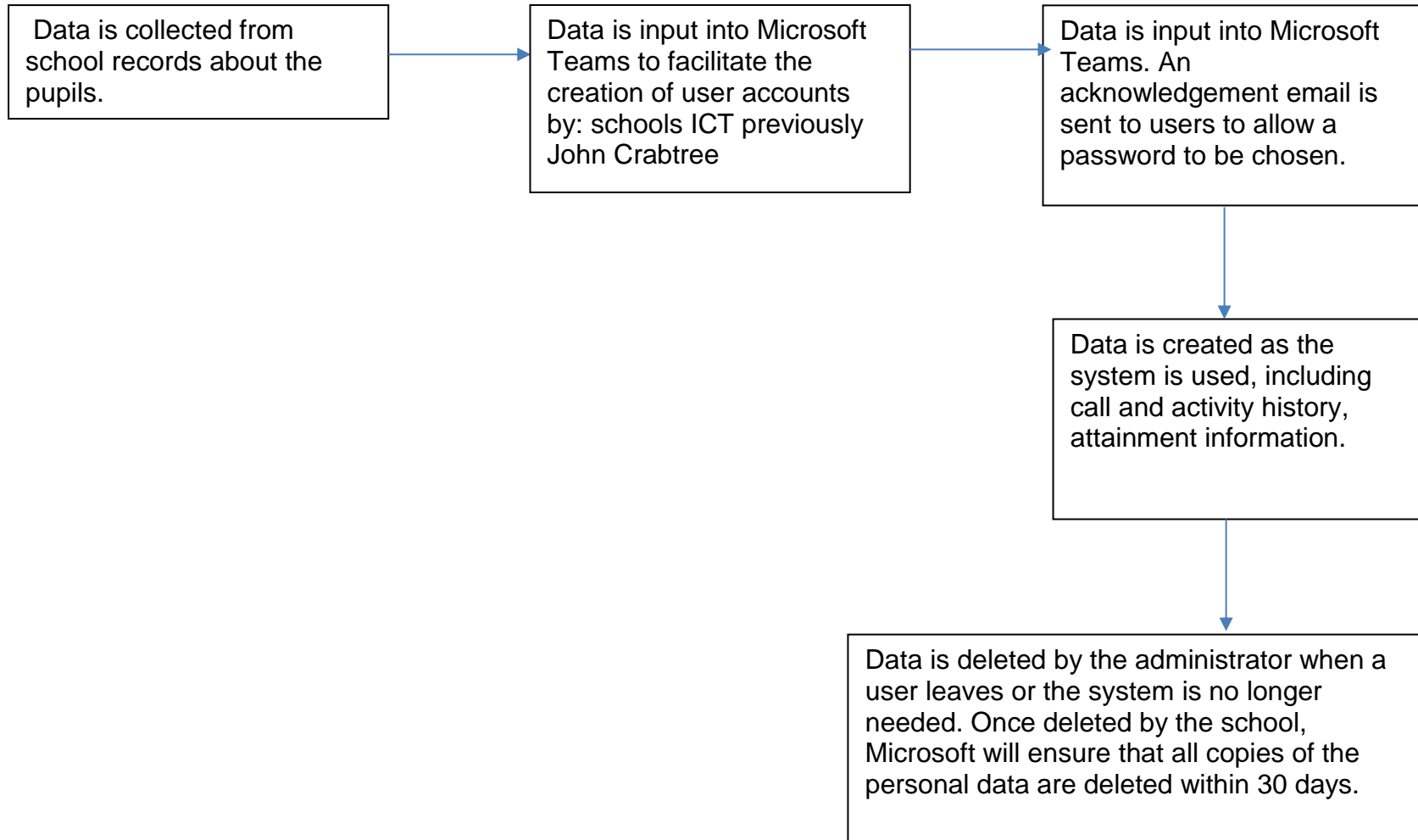
Information Asset Owner/s:

Name:	Louise Wallen
Job Title:	Headteacher
Service:	
Telephone:	01765635276
Email:	Headteacher@northstainley.n-yorks.sch.uk

System Administrator/ICT Contact (if applicable):

Name:	Rachel Stelling
Job Title:	Administrator
Service:	
Telephone:	01765635276
Email:	Admin@northstainley.n-yorks.sch.uk

PART ONE – INFORMATION FLOW



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?	<i>Louise Wallen</i>		<input type="checkbox"/>		
How many individuals will be affected by this project?	52		<input type="checkbox"/>		
Who are the Data Subjects?	<i>Pupils</i>		<input type="checkbox"/>		
Please select any information that will be processed:	Personal Identifiers/information		Special Category		<input type="checkbox"/>
	<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 checked="" 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	
<input type="checkbox"/>	IP addresses	<input type="checkbox"/>	Genetic/Biometric (eg. Thumbprint)		
	<input type="checkbox"/> Other (please state): Call History, Call Quality data, Support/Feedback data,		Because of the nature of recorded conversations, there is the potential for		


		Diagnostic and service data. Video/audio recordings of calls.		special category data to be discussed.	
How will the personal data be collected?	Directly from the Individual			<input type="checkbox"/>	
	From another Internal system (integris)				
Does this processing include data matching, automated decision making or profiling? (please describe)	No.			<input type="checkbox"/>	
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. <i>(Please speak with your DPO about this)</i>	e) Public Task (specify)		Choose an item.		<input type="checkbox"/>
	Specify: The system allows for the provision of effective education through face-to-face contact between students and staff. This supports learning, working and wellbeing during the ongoing pandemic and elsewhere where remote learning is necessary, in line with education legislation.				
If you are processing Special Category Information what is the lawful basis for processing this information <i>(Please speak with your DPO about this)</i>	N/A		Choose an item.		<input type="checkbox"/>
	Basis in law and schedule condition (if applicable)/specify: 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.			<input type="checkbox"/>	
How will you tell people about this processing?	Emailing the parents to inform them and send the logins for the pupils			<input type="checkbox"/>	
	<input checked="" type="checkbox"/>	Yes			<input checked="" type="checkbox"/>

Do you need to update your privacy notices?	<input type="checkbox"/>	No	
3. Purpose Limitation			
Are you going to use information you already hold about individuals for a purpose it is not currently used for?	<input type="checkbox"/>	Yes	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	No, information is already held under the lawful basis of Public Task, as it is required for the provision of education, or under contractual obligation in line with employment law for staff.	
Have you identified all of the purposes for which you will use personal information?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>
	<input type="checkbox"/>	No. If no, why not?	
Will people expect their information to be processed in this way?	<input checked="" type="checkbox"/>	Yes – due to the COVID-19 lockdown, although they will be fully informed and objections taken.	<input type="checkbox"/>
	<input type="checkbox"/>	No, please give details:	
4. Data Minimisation			
How will you ensure you are only collecting information that is relevant to this specific purpose?	<p>When using video surnames will be turned off from display names and virtual backgrounds will be used where appropriate.</p> <p>A code of conduct will be written and signed by relevant staff and students/parents to ensure that inappropriate topics are not discussed, and that backgrounds are kept neutral, etc.</p> <p>Documents will only be uploaded that support the education of children. Any documents/comments that are uploaded by other users will be checked by current teacher on call, and any that are not for the purpose specified will be removed.</p>		<input checked="" type="checkbox"/>
Have you considered what information you could disregard without compromising the project?	<input checked="" type="checkbox"/>	Yes, please detail if any has been removed:	<input type="checkbox"/>
	<input type="checkbox"/>	No Microphones will be turned off when not in use.	

		The teacher on the call will monitor all content of the call.	
5. Accuracy			
How are you going to ensure that the personal information will be kept accurate and up to date?	When TEAMS is no longer required – personal information and accounts will be removed.		<input type="checkbox"/>
How are you going to ensure that the quality of the data you collect is sufficient for your intended purpose?	Data will be double checked when added and then removed when the school no longer requires TEAMS logins for educational class calls		<input type="checkbox"/>
If you are procuring a new system does it allow you to amend and / or delete information when necessary? <i>(Consult IT as necessary)</i>	<input checked="" type="checkbox"/>	Yes. https://docs.microsoft.com/en-us/microsoftteams/archive-or-delete-a-team If a user (or an administrator on the user's behalf) deletes the data, Microsoft will ensure that all copies of the personal data are deleted within 30 days.	<input type="checkbox"/>
	<input type="checkbox"/>	No, please give details:	
	<input type="checkbox"/>	Notes can be added to the system where accuracy is disputed	
	<input type="checkbox"/>	N/A	
6. Storage Limitation / Records Management			
How long will the information be kept for? (retention period)	The TEAMS sessions are not recorded		<input type="checkbox"/>
	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>

Are you procuring a system that will allow you to delete information in line with your retention periods? (Consult IT as necessary)	<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? (Consult IT/processor as necessary)	<p>The administrator can delete users or teams: https://docs.microsoft.com/en-us/microsoftteams/archive-or-delete-a-team</p> <p>They are not stored externally</p>		<input type="checkbox"/>
Will destruction be certificated or added to a destruction log?	<input type="checkbox"/>	Yes, please specify: any films that are deleted, if recorded, will be added to the destruction list on Sharepoint.	<input type="checkbox"/>
	<input type="checkbox"/>		
Where will information be stored/accessed?	Cloud based application		<input type="checkbox"/>
	Other (specify): In Microsoft's data centres in the UK and in the school		
If you are using a 'Cloud Based' system to store or transfer information, where is the geographical location of the server/s?	<p>In the UK. If your tenant is provisioned in (...) the United Kingdom, or the United States, Microsoft stores the following customer data at rest only within that location:</p> <ul style="list-style-type: none"> - Teams chats, team and channel conversations, images, voicemail messages, and contacts - SharePoint Online site content and the files stored within that site - Files uploaded to OneDrive for Business <p>More information and instructions for checking this for your own account can be found here: https://docs.microsoft.com/en-us/microsoftteams/location-of-data-in-teams</p>		<input type="checkbox"/>

If back up information is stored off-site, where is the geographical location?	As above.	<input type="checkbox"/>
7. Security		
Who will have access to the information within the organisation?	Roles:	<input type="checkbox"/>
What controls have been put in place to limit access to the information?	Password protection. Multi-factor Authentication (this must be turned on by the school's administrator).	<input type="checkbox"/>
If you are implementing a new system, does this system have the ability to audit access (audit trails)?	<input checked="" type="checkbox"/> Yes. The following is included: Team creation, Team deletion, Added channel, Changed setting (all items found here: https://docs.microsoft.com/en-us/microsoftteams/audit-log-events#teams-activities)	<input type="checkbox"/>
	<input type="checkbox"/> No	
	<input type="checkbox"/> N/A	
Does your new system/hardware/procedure provide adequate protection against security risks? Please detail. (Consult IT as necessary)	https://docs.microsoft.com/en-us/microsoftteams/teams-security-guide Password protection - two-factor authentication can also be turned on, as well as other optional features to increase the security of virtual classrooms.	<input checked="" type="checkbox"/>
Are staff undertaking any additional training to help use new systems/procedures? Will this include Data Protection training?	<input checked="" type="checkbox"/> Yes Staff were given training and instructions on how to use the software.	<input type="checkbox"/>
	<input type="checkbox"/> No. If no why not?	
Is there a disaster recovery plan in place in case of equipment/software	<input checked="" type="checkbox"/> Yes - https://docs.microsoft.com/en-us/microsoftteams/rooms/recovery-tool	<input type="checkbox"/>

failure? (you may need to ask your provider to supply this)	<input type="checkbox"/>	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)	https://docs.microsoft.com/en-us/microsoftteams/teams-security-guide Security clause in contract as outlined in Article 28 of the GDPR: “The data importer has implemented and will maintain appropriate technical and organizational measures, internal controls, and information security routines intended to protect Customer Data, as defined in the Security Practices and Policies section of the DPA, against accidental loss, destruction, or alteration; unauthorized disclosure or access; or unlawful destruction. In addition, those measures shall comply with the requirements set forth in ISO 27001, ISO 27002, and ISO 27018”		<input type="checkbox"/>	
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)	GDPR compliant contract.		<input type="checkbox"/>	
If using a data processor, do you have a written contract in place with GDPR clauses?	<input checked="" type="checkbox"/>	 MS Teams - Contract Checklist.d Yes (please attach)	<input type="checkbox"/>	
	<input type="checkbox"/>			No
	<input type="checkbox"/>			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 – only sharing with processors.		<input type="checkbox"/>	
	<input type="checkbox"/>	Yes (please attach)	<input type="checkbox"/>	

Is there a sharing agreement in place? <i>(Please speak with your DPO about this)</i>	<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:	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	No	
	<input checked="" type="checkbox"/>	N/A	
How will information be transferred?	N/A		<input type="checkbox"/>
10. Rights of the Data Subject			
How will you manage 'Subject Access Requests' or other requests regarding information rights? <i>(Rectification, erasure, objection, and restriction etc.)</i>	Requests will be handled in line with the school's policy. Requests made to Microsoft will be passed to the school (as stated in their data processor agreement)		<input type="checkbox"/>
If procuring a new system, will this allow you to fulfil the rights of the data subject mentioned above?	<input checked="" type="checkbox"/>	Yes, detail as needed: Access to information and ability to amend and delete is available.	<input type="checkbox"/>
	<input type="checkbox"/>	No	
If the project involves automated decision making do you have a process in place to facilitate human intervention? Please detail.	N/A		<input type="checkbox"/>
Will your data processing exclude individuals from using a service or from exercising any rights?	<input type="checkbox"/>	Yes, detail as needed:	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	No	
11. Accountability			

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"/>
	<input type="checkbox"/>	Policies	
	<input type="checkbox"/>	Procedures	
If needed, have you consulted relevant stakeholders/ICO? What was the outcome?	<input type="checkbox"/>	Yes, who? please add outcome details:	<input type="checkbox"/>
	<input checked="" type="checkbox"/>	No	

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

Name:	N/A
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	

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

Name:	Microsoft
Contact Details:	https://support.microsoft.com/en-us/home/contact?ContactUsExperienceEntryPointAssetId=S.HP.teams
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?
Because of the nature of recorded conversations, there is the potential for special category data to be discussed.	Code of conducts have been sent to all parents and staff to be read and signed.	Reduced
Parents, students and staff are not aware of what data will be shared about them with Microsoft.	Parents made aware of information needed to for set up of accounts.	Reduced
There is the possibility that recordings will be taken where they are not needed.	No one is to record the sessions.	Reduced
Security features such as locked classrooms, waiting rooms and virtual backgrounds are optional and can be turned off by users.	Staff made aware of what can be used and how to use it. Parents made aware in code of conduct.	Reduced
Teams is not currently included on the Information Asset Register, so the school is not compliant with its Article 30 (records of processing) obligations.	Added to the Information Asset register	Eliminated

PART FOUR – SIGNATURES AND REVIEW

Information Asset Owner

Name: Louise Wallen

Job Title: Headteacher

Date: Click or tap to enter a date.

Signature:

Data Protection Officer

Name: Alex Coughlan obo Veritau Ltd

Job Title: Data Protection Compliance Auditor

Date: 27/05/2021

Signature: A Coughlan

Senior Officer (if applicable)

Name:

Job Title:

Date: Click or tap to enter a date.

Signature:

REVIEW DATE: 01/01/2022