Tapestry
Data Protection Impact Assessment

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

Date final DPIA issued 02/03/2022

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 child'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:

Project Manager/Owner:

Name:	*Laura-Mae Gregory*
Job Title:	**Class 1 Teacher**
Service:	
Telephone:	**01765635276**
Email:	**laura-mae@northstainley.org**

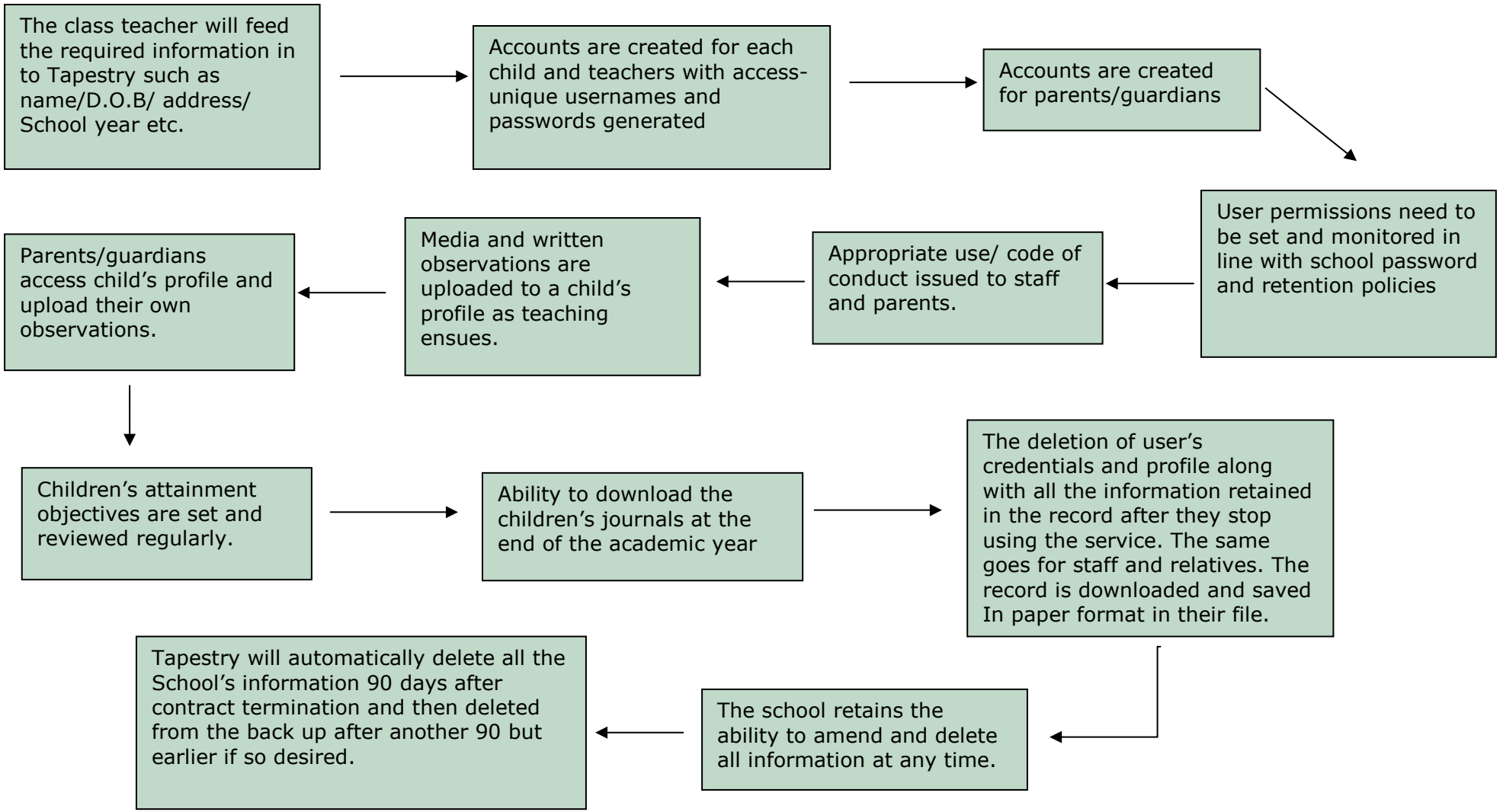
Information Asset Owner/s:

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?	Louise Wallen				☐
How many individuals will be affected by this project?	***18***				☐
Who are the Data Subjects?	Pupils and parents				☐
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 (e.g. Thumbprint)	
	☐	Other (please state):	☐	SEN provision.	
How will the personal data be collected?	Directly from the Individual				☐
	From an Internal system. RM Integris				

Privacy Issue	Comments		Is there a risk? Address in Part Three
Does this processing include data matching, automated decision making or profiling? (please describe)	no		☒
2. Lawfulness, Fairness, and Transparency			
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.	e) Public Task (specify)	Choose an item.	☐
	Specify: Article 6(1)(e) public task- The Education Regulations 2005- to fulfil the requirements of law to keep an updated educational record for each pupil.		
	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	N/A	Choose an item.	☐
	The school does not purposely process special category data. However, there is a risk that a child or parent could include a category in the work, comments or observations. Guidance will be provide to reduce this risk.		
If you are using consent how are you collecting this and how will people be able to withdraw their consent?	Consent is not being used – Parents are told about the program and given login details. If someone were to object we would not use Tapestry for this child.		☐
How will you tell people about this processing?	Parents have been notified and provided with login details.		☐
Do you need to update your privacy notices?	☐	Yes	

Privacy Issue	Comments		Is there a risk? Address in Part Three
	☒	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			
Have you considered what information you could disregard without compromising the project?	☐	Yes, please detail if any has been removed: Only relevant information is used. We have not needed SEN as yes and therefore this is disregarded as it is not needed on the program. Information about this is held somewhere else	☐
	☐	No	
5. Accuracy			
How are you going to ensure that the personal information will be kept accurate and up to date?	Laura-Mae Gregory (class 1 teacher) 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.		☒

Privacy Issue	Comments		Is there a risk? Address in Part Three
How are you going to ensure that the quality of the data you collect is sufficient for your intended purpose?	Basic information is kept, nothing is added that is recorded elsewhere.		☐
If you are procuring a new system does it allow you to amend and / or delete information when 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 if not instructed otherwise but are happy to return/delete the information sooner or at any point on request. The school can delete and amend data at any time using the control panel on Tapestry. 2) If a child leaves the school their file will be deleted from the system in line with the school's retention schedule.		☐
Are you procuring a system that will allow you to delete information in line with your retention periods?	☒	Yes	☐
	☐	No, if no why not?	

Privacy Issue	Comments		Is there a risk? Address in Part Three
	☐	N/A	
What method will be used, to securely destroy paper and/or electronic records?	Information will be downloaded to hard copy from the system. Paper records are kept in the file for that child which follows them to their next school.		☐
Will destruction be certificated or added to a destruction log?	☒	Yes, please specify: this will be recorded on the destruction schedule from now on.	☐
	☐	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?	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: Class 1's teacher Laura-Mae Gregory only		☐
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.		☐

Privacy Issue	Comments		Is there a risk? Address in Part Three
	• 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. (This should be the default view and only changed at the discretion of the Head teacher or SIRO). • Connections between the school and Tapestry are encrypted. • If you choose to print the records, the school will need a policy regarding physical information		
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.	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. Please specify here, if these will be provided to your school for assurance purposes.		☐

Privacy Issue	Comments		Is there a risk? Address in Part Three
Are staff undertaking any additional training to help use new systems/procedures? Will this include Data Protection training?	☒	Yes (please give details). If we have a new class 1 teacher, training will be given	☐
	☐	No. If no why not?	
Is there a disaster recovery plan in place in case of equipment/software failure?	☒	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?	Yes, this is demonstrated in the contract checklist. Full assurance has been granted by Veritau, meaning that all Article 28 clauses are included.		☐
If using a data processor, how has the provider demonstrated that they are compliant with the UK GDPR?	Yes - the contract is UK GDPR compliant and Tapestry have their own DPO appointed. Full assurance has been granted via the Veritau contract checklist.		☐
If using a data processor, do you have a written contract in place with the UK 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?	Tapestry is a data processor so this section is not relevant.		☐
Is there a sharing agreement in place?	☐	Yes (please attach)	☐

Privacy Issue	Comments		Is there a risk? Address in Part Three
	☐	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?			☐
10. Rights of the Data Subject			
How will you manage 'Subject Access Requests' or other requests regarding information rights?	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." The any parent objects to the use of the system, the pupil will be removed.		☐
If procuring a new system, will this allow you to fulfil the rights of the data subject mentioned above?	☒	Yes. The rights will be fulfilled.	☐
	☐	No	
If the project involves automated decision making do you have a process in place to facilitate human intervention? Please detail.	N/A		☐

Privacy Issue	Comments		Is there a risk? Address in Part Three
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:	☐
	☒	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
Contact Details:	
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 special category data and ways to minimise the presence. E.g. just pictures of the child alone with a neutral background.	*Accepted – a code of conduct will be sent out for future pupils.*
In the event of a subject access request Tapestry is not on the records search about a data subject.	Ensure that Tapestry is added to the IAR so that it is checked in the event of an SAR.	*Risk Eliminated*
Risk of breaking the UK GDPR Compliance if access and accounts aren't monitored.	Ensure that the information asset owner is aware of their responsibility to keep the system up to date Add the system to the starter and leaver processes checklist	*Risk Eliminated*
Parents are unaware of the new system.	Ensure a letter is sent to parents detailing the system and providing them with log in details. If they object, their child will not be included in this system	*Risk Eliminated*
Users are unaware of what is appropriate to upload to the journal and the manner in which to comment.	An acceptable use policy will be administered to ensure both staff and parents know what proper conduct of behaviour is.	*Accepted – a acceptable use policy will be sent out for future pupils.*
Privacy Notice has not been updated to reflect Tapestry's processing activities	The Privacy Notice will be updated in order to ensure transparency.	*Risk Eliminated*
Location of the Servers being outside the United Kingdom	Regularly review the adequacy agreement with the EU.	*Accepted*

Part Four – Signatures and Review

Information Asset Owner
Name: Louise Wallen
Job Title: Headteacher
Date: 18/01/2022
Signature: L.Wallen

Data Protection Officer
Name: Shan Thistleton (on behalf of Veritau Ltd)
Job Title: Senior Internal Auditor
Date: 02/03/2022
Signature: S Thistleton

Senior Officer / Caldicott Guardian (If Applicable)
Name:
Job Title:
Date:
Signature:

REVIEW DATE: 18/01/2023 *(Recommend annually)*