EDClass Limited Data Protection 2018 & UK GDPR

Change Date	Changed By:	Change Description	Changed Authorised by:
26/03/2014	Ian Hargreaves	Creation of Data Protection and Transfer Agreement	Sam Warnes
04/05/2016	Ian Hargreaves	Addition of EDClass and SIMS integration	Sam Warnes
15/09/2016	Ian Hargreaves	Addition of EDVirtual	Sam Warnes
01/12/2017	Lee Bell	Addition of EDClass +	Sam Warnes
02/02/2018	Simon Hall	GDPR Amendments v1	Cara Radford
23/02/2018	Simon Hall	GDPR Amendments v1.3	Cara Radford
19/04/2018	Simon Hall	GDPR Amendments v1.4	Ian Hargreaves
14/05/2018	Simon Hall	GDPR Amendments v1.5 AWS Encrypted server at rest installation All Staff GDPR Level 2 complete. AWS security resources	Ian Hargreaves
25/05/2018	Ian Hargreaves	Reference to new UK Data Protection Act 2018	Cara Radford
26/06/2018	Simon Hall	Amendments to WONDE data requests	Lee Bell
30/11/2018	Simon Hall	Removed old server information and added AWS security	Ian Hargreaves
10/01/2019	Simon Hall	Section Added: Homeworking	Ian Hargreaves
09/01/2020	Cara Radford	Renewal	Ian Hargreaves
04/01/2021	Cara Radford	Renewal after UK left EU	Ian Hargreaves
04/01/2022	Cara Radford	Renewal	Ian Hargreaves
05/04/2022	Ian Hargreaves	Cyber Essentials Cert	Cara Radford
25/08/2022	Ian Hargreaves	Extension of ICO Registration	Cara Radford
24/05/2023	Ian Hargreaves	DPIA. Added fields and descriptions as part of the data transfer agreement & encryption details amended	Cara Batsford
01/11/2023	Ian Hargreaves	Deletion process of records from the database	Cara Batsford
09/02/2024	Ian Hargreaves	Specific attention to the Data processing requirements under Article 28 of the UK GDPR	Cara Batsford
10/10/2024	Ian Hargreaves	Highlighting ISO27001:2022 certification.	Cara Batsford

EDClass Ltd covering all its production entities of the EDClass online alternative provision platform:

EDClass Ltd operates a SaaS (Software as a Service) by way of EDClass. EDClass is an online education service to help students engage in their learning when not attending their mainstream classes.
EDClass offers students the opportunity to engage in education away from the traditional classroom by providing online support and supervision from UK qualified teachers. EDClass teaching, support and supervisory colleagues will work with students/ pupils to help raise their attainment levels, improve engagement and subsequently increase attendance.

Use of student data will be to help educate, engage, safeguard, supervise and monitor students at home and at school. This will be through the access to an online web system which requires the use of a device web cam, speakers and microphone.

DATA Protection Agreement Ensures:

EDClass Ltd complies with Data Protection Act 2018 Including UK GDPR Protects rights of Staff, Customers and our partners in business Transparent in the handling of data. EDClass Ltd holds a current ISO 27001:2022 certificate emphasising the company's stance of operating robust Information Security Management Systems.

RISK:

Responsibilities of Data within EDClass Ltd is the responsibility of all staff, knowing and understanding data policy. Main responsibility will be with the board of directors, and the data protection officer will continually inform the board of directors of any risk and will be responsible for continual risk assessment. With the office of EDClass Ltd, or any 3rd party businesses premises.

Product Development Manager will be responsible for all future system upgrades, and safe integration of any data transfer.

DATA TRANSFER/ DATA PROCESSING AGREEMENT, REQUIREMENTS & PURPOSE:

EDClass Ltd operate under the auspices of Article 6 of the UK GDPR 2018: the lawful basis for processing data is for contractual purposes.

All current EDClass Ltd employees hold GDPR level 2 certificates, future employees undergo basic GDPR awareness courses during induction and will be expected to undergo Level 2 training by the end of any probationary period. EDClass Ltd Digital Security Policy (IS-POL 005), as part of the most current ISO 27001:2022 standards: *"It is essential that all employees follow strict confidentiality practices and GDPR guidelines when dealing with identifiable information. All employees have signed a confidentiality clause as part of their contract of employment. If any authorised data needs to be shared with third parties, then file sharing should be completed via Zoho work drive, which features complete security mechanisms for keeping data secure and confidential."*

The data required is to create user accounts in the EDClass system, the users have chance to create and or update information including usernames and passwords.

The student data can only be viewed and edited by authorised users who are given this level of access permissions, by the consent of the establishment, i.e. teaching staff. Teaching staff however, can only be defined to particular individuals and/or groups, if desired. All user events are comprehensively logged, allowing an audit trail of what events have been completed and by which user.

The data currently requested in a student profile is to enhance the correct level of teaching for that student. As a preferred alternative provision its invaluable an educational establishment and EDClass Ltd communicate and share data to achieve best outcomes and the upmost safeguarding for students using the provision.
Required details and reason why are outlined below and the reasons this data is needed. Date is requested via WONDE, these can be found at www.wonde.com , (WONDE GDPR document also supplied) Data needed includes Forename, Middle Name, Surname, Date of Birth, Year group, Language, Special Educational Needs, predicted subject levels/grades, achieved subject levels/grades. https://www.wonde.com/wp-content/uploads/Data-

Processing-Agreement-Wonde.pdf

Student Profiles are manually added by school and are not mandatory fields when adding to offsite seats only: Both EDClass Ltd and educational establishments aim to work for best results and student profiling is key.
Additional information requested is only for the purpose of essential data for students on offsite "seats." This includes academic levels, SEN needs, SEMH, attendance, behaviour. *(Mid-term development this information will be loaded automatically via MIS integration with secure connection via WONDE)*

Additional Safeguarding information will be requested to protect staff from the allocating school, staff from EDClass Ltd as well as increasing the protection of the student concerned. This data is to be collated under legitimate intentions and communication will be via a recorded phone call or via institute emails only.
Data captured will be retained in a fully secure environment, with privileged access.
All identifiable data will be soft deleted when no longer required or requested by the school in writing. "No longer required" will be September 1st following leaving year 6, year 11 or Year 13 dependent on type of academic establishment. Schools will be responsible to back up all their data prior to deletion and will be responsible for the data based on their own GDPR policy.

The benefits of data being used by the EDClass system:
- ☐ To identify users
- ☐ To help mass upload the data to create accurate and correct user accounts (reduces human error)
- ☐ To help track and monitor attendance, performance and attainment of all users
- ☐ The data would help with the filtering of user cohorts to save time for the end user to input individual accounts
- ☐ Using WONDE: Ensures encrypted data between MIS system and EDClass Ltd for staff and students.
- ☐ Accounts can be manually configured anonymously
- ☐ All electronic data will require a password to access, when stored on local PC's, they will be password protected for access, as well as the corresponding data having additional password protection.
- ☐ No encrypted data to be transferred at the same time with access passwords.
- ☐ As an AP it's invaluable to have a continuous working partnership with schools aiming for the best outcomes of their students.

EDClass Ltd aim not to print out any sensitive data, in the event of this happening all paper will be stored safely until shredded or passed to the person who the data refers to.

Data Protection Impact Assessment (DPIA):

The establishments who wish to commission the EDClass SaaS can send the relevant questionnaire and due diligence checks to the EDClass DPO and all relevant information will be submitted. To help any establishment with this process EDClass has not only conducted its own DPIA (available on request), but external organisations have also audited and published a DPIA of the EDClass SaaS.
Visit:
https://school.wonde.com/application/edclass/security?signature=545fdbe7536b959ae4f2d2936b4f2a0f1a27b830cbda952de1dc3c1a319011f4

EDClass Data Protection Policy for MIS Integration:

For EDClass to work effectively the system requires student and teacher information from the MIS to allow the resource to help track each student's performance, activity and progress.

The data given by schools is fully under their control, and we abide by very stringent policies and procedures in storing and processing any data received. The processing of such data is for daily running and usage by school/ academy/ local authority users (both student and teacher) and the processing to identify user and deliver good effective customer service and technical help when users require. This document highlights and details what data is captured, along with the reasoning for such a capture. This policy specifically targets the account creation on the EDClass system for both students and teachers who will use the resource.

We capture and store the following student data also highlighting why the system requires this particular piece of data:

- ☐ **Preferred Forename** - Identifying reasons
- ☐ **Middle Name(s)** - Identifying reasons   *Names help to create a default username to access the system*
- ☐ **Preferred Surname** – Identifying reasons
- ☐ **Gender** – To help with filtering and monitoring of performance and progression i.e. filter all Year 9 girls in Maths
- ☐ **Date of Birth** – To help with identifying those students with the same name and to create a default password to access the system dd/mm/yyyy
- ☐ **Behaviour -** Enable students to receive behaviour repair work lessons
- ☐ **Groups Classed and Subjects –** Enable staff to allocate supporting work to all students quickly and efficiently
- ☐ **SEN –** to help teaching staff best assist any student using the virtual classroom
- ☐ **Timetable –** Speed up processes, identify bandings, enable school EDClass to have a closer working relationship
- ☐ **Photo –** this is optional, and will only be visible with students within the virtual classroom, this is to identify the students online are who they say they are, and gives an extra layer of safeguarding.

If EDClass will form the only education for a student during a school week/ month/ term or is more than 16 hours per week, then students will be expected to onboard/ register on EDClass that conforms with the newly created Accreditation for Online Education Providers (OEAS) by the DfE . Should a student be formally admitted as part of the OEAS then further information from the schools/ academies MIS is required as compliance measures with the DfE standards. EDClass then takes on the roles and responsibilities as an unregistered alternative provision and as such a controller to controller data sharing agreement is to be reviewed and signed by all parties.

Achievement:

Achievement read - (optional, approved)

Achievements type read - (optional, approved)

Achievements action read - (optional, approved)

Achievements points read - (optional, approved)

Achievements comment read - (optional, approved)

Achievements parents notified read - (optional, approved)

Achievements date read - (optional, approved)

Achievements action date read - (optional, approved)

Achievements recorded date read - (optional, approved)

Achievements class read - (optional, approved)

Achievements subject read - (optional, approved)

Achievements total points read - (optional, approved)

Achievement write - (optional, approved)

Achievement delete - (optional, approved)

Assessment:

Assessment read - (optional, approved)

Assessment aspect read - (optional, approved)

Assessment aspect name content read - (optional, approved)

Assessment aspect description content read - (optional, approved)

Assessment aspect type content read - (optional, approved)

Assessment aspect min value content read - (optional, approved)

Assessment aspect max value content read - (optional, approved)

Assessment result read - (optional, approved)

Assessment results result content read - (optional, approved)

Assessment results grade value content read - (optional, approved)

Assessment results student content read - (optional, approved)

Assessment results aspect content read - (optional, approved)

Assessment results result set content read - (optional, approved)

Assessment results collection date content read - (optional, approved)

Assessment results result date content read - (optional, approved)

Assessment result set read - (optional, approved)

Assessment result sets name content read - (optional, approved)

Assessment result sets module content read - (optional, approved)

Assessment result sets source content read - (optional, approved)

Assessment result sets supplier content read - (optional, approved)

Assessment result sets external id content read - (optional, approved)

Assessment result sets locked content read - (optional, approved)

Assessment result sets start date content read - (optional, approved)

Assessment result sets end date content read - (optional, approved)

Assessment template read - (optional, approved)

Assessment templates name content read - (optional, approved)

Assessment templates description content read - (optional, approved)

Assessment templates source content read - (optional, approved)

Assessment templates external id content read - (optional, approved)

Assessment mark sheet read - (optional, approved)

Assessment mark sheets name content read - (optional, approved)

Assessment mark sheets group content read - (optional, approved)

Assessment mark sheets class content read - (optional, approved)

Assessment mark sheets template content read - (optional, approved)

Attendance:

Attendance read - (optional, approved)

Session attendance write - (optional, approved)

Lesson attendance write - (optional, approved)

Attendance summary read - (optional, approved)

Attendance summary student content read - (optional, approved)

Attendance summary authorised absences content read - (optional, approved)

Attendance summary unauthorized absences content read - (optional, approved)

Attendance summary unexplained absences content read - (optional, approved)

Attendance summary approved education activity content read - (optional, approved)

Attendance summary attendance codes read - (optional, approved)

Attendance sessions student content read - (optional, approved)

Behaviour:

Behaviour read - (optional, approved)

Behaviours type read - (optional, approved)

Behaviours subject read - (optional, approved)

Behaviours class read - (optional, approved)

Behaviours status read - (optional, approved)

Behaviours action read - (optional, approved)

Behaviours points read - (optional, approved)

Behaviours comment read - (optional, approved)

Behaviours parents notified read - (optional, approved)

Behaviours incident date read - (optional, approved)

Behaviours action date read - (optional, approved)

Behaviours recorded date read - (optional, approved)

Contacts:

Contacts read - (optional, approved)

Contacts upi read - (optional, approved)

Contacts title read - (optional, approved)

Contacts initials read - (optional, approved)

Contacts surname read - (optional, approved)

Contacts forename read - (optional, approved)

Contacts middle names read - (optional, approved)

Contacts legal surname read - (optional, approved)

Contacts legal forename read - (optional, approved)

Contacts lives with pupil read - (optional, approved)

Contacts court order read - (optional, approved)

Contacts pupil report read - (optional, approved)

Contacts parental responsibility read - (optional, approved)

Contacts in touch communication read - (optional, approved)

Contacts correspondence read - (optional, approved)

Contacts priority read - (optional, approved)

Contacts relationship read - (optional, approved)

Contacts email notification read - (optional, approved)

Contacts push notification read - (optional, approved)

Contacts emergency contact read - (optional, approved)

Contacts attendance notification read - (optional, approved)

Contacts details read - (optional, approved)

Contacts telephone read - (optional, approved)

Contacts address read - (optional, approved)

Contacts identifiers read - (optional, approved)

Contacts username read - (optional, approved)

Contacts barcode read - (optional, approved)

Contacts active directory username read - (optional, approved)

Contacts write - (optional, approved)

Doctors:

Doctors read - (optional, approved)

Doctors mis id read - (optional, approved)

Doctors title read - (optional, approved)

Doctors forename read - (optional, approved)

Doctors middle names read - (optional, approved)

Doctors surname read - (optional, approved)

Doctors practice name read - (optional, approved)

Doctors telephone read - (optional, approved)

Doctors address read - (optional, approved)

Exclusions:

Exclusions read - (optional, approved)

Exclusions type read - (optional, approved)

Exclusions type code read - (optional, approved)

Exclusions reason read - (optional, approved)

Exclusions reason code read - (optional, approved)

Exclusions start date read - (optional, approved)

Exclusions start session read - (optional, approved)

Exclusions end date read - (optional, approved)

Exclusions end session read - (optional, approved)

Exclusions sessions read - (optional, approved)

Exclusions days read - (optional, approved)

Exclusions academic year read - (optional, approved)

Exclusions term read - (optional, approved)

Exclusions comments read - (optional, approved)

Exclusions agencies involved read - (optional, approved)

Exclusions discipline committee date read - (optional, approved)

Exclusions discipline committee result read - (optional, approved)

Exclusions discipline committee reinstatement date read - (optional, approved)

Exclusions committee representation made read - (optional, approved)

Exclusions appeal received read - (optional, approved)

Exclusions appeal result read - (optional, approved)

Exclusions appeal result date read - (optional, approved)

Exclusions appeal reinstatement read - (optional, approved)

Groups, Classes & Subjects:

Classes read - (optional, approved)

Classes name read - (optional, approved)

Classes description read - (optional, approved)

Classes subject read - (optional, approved)

Classes code read - (optional, approved)

Classes alternative read - (optional, approved)

Subject read - (optional, approved)

Subjects name read - (optional, approved)

Subjects code read - (optional, approved)

Subjects active read - (optional, approved)

Groups read - (optional, approved)

Groups name read - (optional, approved)

Groups code read - (optional, approved)

Groups type read - (optional, approved)

Groups description read - (optional, approved)

Groups notes read - (optional, approved)

Groups division read - (optional, approved)

Medical:

Medical events read - (optional, approved)

Medical Events description read - (optional, approved)

Medical Events type read - (optional, approved)

Medical Events date read - (optional, approved)

Medical Events follow up date read - (optional, approved)

Medical conditions read - (optional, approved)

Medical Conditions description read - (optional, approved)

Medical Conditions date received read - (optional, approved)

Medical Conditions severity read - (optional, approved)

Medical Notes read - (optional, approved)

Medical Notes title read - (optional, approved)

Medical Notes note read - (optional, approved)

Photo:

Photo read - (optional, approved)

Photos content read - (optional, approved)

Photos person id read - (optional, approved)

Photos person type read - (optional, approved)

SEN:

Special education needs read - (optional, approved)

SEN description content read - (optional, approved)

SEN rank content read - (optional, approved)

SEN category code content read - (optional, approved)

SEN category description content read - (optional, approved)

SEN start date content read - (optional, approved)

SEN end date content read - (optional, approved)

SEN type code content read - (optional, approved)

SEN type description content read - (optional, approved)

Student:

Students read - (optional, approved)

Students upi read - (optional, approved)

Students initials read - (optional, approved)

Students surname read - (optional, approved)

Students forename read - (optional, approved)

Students middle names read - (optional, approved)

Students legal surname read - (optional, approved)

Students legal forename read - (optional, approved)

Students gender read - (optional, approved)

Students date of birth read - (optional, approved)

Students demographics read - (optional, approved)

Students in LEA care read - (optional, approved)

Students ever in care read - (optional, approved)

Students contact details read - (optional, approved)

Students email read - (optional, approved)

Students education details read - (optional, approved)

Students current nc year read - (optional, approved)

Students part time read - (optional, approved)

Students admission date read - (optional, approved)

Students leaving date read - (optional, approved)

Student Absences:

Student absences read - (optional, approved)

Student absences student id read - (optional, approved)

Student absences event type read - (optional, approved)

Student absences start at read - (optional, approved)

Student absences end at read - (optional, approved)

Student absences absence type read - (optional, approved)

Student absences reason read - (optional, approved)

Student absences comment read - (optional, approved)

Student absences authorised by read - (optional, approved)

Student absences write - (optional, approved)

The school still has the right to deny **any** these fields from being processed as compliance with both EDClass and WONDE policies which states:
"No information will be transmitted to a third party application (Data Processor) without approval from a school (the Data Controller). Third party applications are only permitted to request access of school data if they have a signed or agreed contract in place."
 https://www.wonde.com/wp-content/uploads/School-Data-Information-Security-Overview-V1.0.pdf

The teacher data captured by EDClass is:

- ☐ **Title** – Addressing communications correctly
- ☐ **Preferred Forename**
- ☐ **Middle Name(s)**   *Names are used to identify user and help to create username*
- ☐ **Preferred Surname**
- ☐ **Initials**
- ☐ **Position –** To allow for escalation of concerns with students
- ☐ **Class Groups** – To show and permit teachers to view their own groups, and highlight to SLT who supervises this group. This helps with reports and assessment.
- ☐ **Subject Specialism** – Indicates what subject the above class is studying

Passwords: Teachers will be asked to set new passwords at the first-time log in.
Passwords: Students are unable to change passwords once set at integration.

Additional teacher data is given for those school/ academy/ local authority colleagues who have a responsibility with the delivery of EDClass. This data is processed using Zoho CRM will be to provide effective customer service, help, advice and guidance when using or enquiring about the EDClass system.

> *https://www.zoho.com/crm/gdpr/*
> *https://www.zoho.com/security.html*

The student and teacher data is collected via an export from your designated MIS program using WONDE (Data Protection Policy, supplied separately) all data is up-to-date according to the MIS data gathered and stored from the school. The update isn't 24/7 it is only requested once per week and will ensure keeping the EDClass system up to date, with new students or leavers. EDClass ltd will require written conformation to delete any school leavers.

Students and teachers are assigned usernames and passwords that protect access to the EDClass system and ensure that students only access the relevant area, and that teachers can only access the student data relevant to them and their school.

Data will be taken upon commencement of the annual contract term and any other collection during the contract term when there is a significant change or additional services required. The school/ academy/ local authority would request this additional collection via verbal/ written consent.

All data is stored and backed up using secure AWS (Amazon Web Services) server (based in UK and/ or EEA territory), which features SALT encryption technologies and firewalls to protect the information being accessible by any other party. The EDClass team are all certified and trained to the latest policies for data protection; certificates can be viewed upon request.

All teaching interaction is recorded for safeguarding purposes. These recordings are processed and saved in the school/ academy/ local authority's own AWS S3 bucket provided by EDClass Ltd to help with the retrieval and or where

Schools/ academies have the ability to place student and teacher accounts directly on to their database version of the EDClass software. Entries can be made anonymously, however this will limit the functionality and features (especially safeguarding mechanism) of the EDClass service and platform.

Encryption:

EDClass Ltd follow a strict encryption policy as part of the most recent ISO 27001 criteria (IS-POL 011).
All data exchanged with Wonde Ltd and EDClass Ltd application and API is always transmitted via HTTPS using Secure Sockets Layer (SSL), a cryptographic protocol that is designed to protect against eavesdropping, tampering, and message forgery.

All data is encrypted at rest and during transit. Amazon Web Services uses the techniques detailed in DoD 5220.22-M ("National Industrial Security Program Operating Manual ") or NIST 800-88 ("Guidelines for Media Sanitization") to destroy data as part of the decommissioning process.

Data servers used by EDClass Ltd are an Amazon Web Services (AWS) platform with further advanced encryption, meaning all data is encrypted during transit and at rest. The system has managed threat detection and enhanced firewall protection.

Security Resources can be found at the following address https://aws.amazon.com/security/security- resources/

AWS servers, SQL databases. Locked to authorisation from 2 IP locations with SALT encryption. Authorised personnel need to make an Access Request from 2 IP locations in order to access data. Which comes with traceable date and time stamped.

The data viewed by the EDClass team is to locate a student/teacher username and password, should any information be forgotten and help to the user(s) is required. Again, all user events are comprehensively logged, allowing an audit trail of what events have been completed and by which user.

WONDE Data Protection Policies if not attached can be found on their website. This document should help specifically:

https://www.wonde.com/wp-content/uploads/Wonde-DPIA-support-document-V2.0.pdf

Other documents available on https://www.wonde.com/security/ With these, you'll be able to find more details regarding where data is stored (AWS Ireland) and reassurance that data is encrypted end to end at both transit and at rest. There will be more information to come that will be released to schools in due course.

Student and staff data will be added to the system via and encrypted service through WONDE offering the highest protection.

EDClass Data Officers then make sure that information is destroyed under the EDClass Ltd Data Protection Policy, breach of such policy leads to disciplinary procedures.

The alternative for the educational establishment is to enter data into the system themselves, and/or create anonymous accounts.

Data Audits:

EDClass Ltd endeavours to be fully compliant with all elements of the ISO certification frameworks 9001, 21001 and 27001. These certifications mandate that audits are completed at least annually by an external agency Clear Quality Ltd *(at time of publishing).* Each ISO standard requires that internal audits are conducted more frequently and especially when a significant change has occurred within the business. At time of publishing EDClass Ltd conducts internal ISO audits monthly. Outcomes and assessments of said audits can be sent upon receipt of written request by the commissioner and contract holder of the EDClass system.

EDClass Ltd will, insofar as this is possible, allow for and contribute with the educational establishments (controller) obligations to demonstrate compliance via audits and/ or inspections conducted by the controller or another auditor mandated by the controller. EDClass Ltd **must** be made aware of the 3rd party auditor and evidence **must** be provided by the controller showing proof of due diligence of said auditing organisation.

Staff Homeworking
EDClass Ltd enforces high level security and all access is monitored and recorded. Limited authorised staff has access to the system to be able to work from home. EDClass Ltd has strict criteria for this to be allowed.
Laptops / Desktops are EDClass Ltd owned and password protected for entry. There is also MFA to accept individuals to work from home locations and access to cloud-based services contracted to EDClass Ltd.

The only student data available from home will be Student name and school name for marking purposes, all other data is unavailable.

EDClass Ltd has a fully tracked auditing system, for the protection of all staff and data.

DATA Breach:
EDClass Ltd will immediately on recognition of a breach assess the level and consequence of the breach. Where a serious breach has occurred, the ICO will be immediately informed and the people affected will be informed.
Where a data breach will not harm the end user a public notice will be released. The response for data breaches will be within 72 hours.

EDClass Ltd (in accordance with UK GDPR Article 28) will consider the nature of the processing, assist the controller by appropriate technical and organisational measures, insofar as this is possible, for the fulfilment of the controller's obligation to respond to requests for exercising the data subject's rights which directly involves EDClass Ltd and its products.

Sharing Safeguarding information:

The sharing of safeguarding data supersedes GDPR If it's believed gaining consent regards the sharing of a child's personal data would put that child at risk; consent does not have to be gained. It is expected that professional agencies (i.e. social services) and regulatory organisations (i.e. OFSTED) that the data will be shared with as a necessity for the protection and welfare of a child to have all safeguarding practices in place.

Sub Processors of Data:

The data used for the delivery and interaction of the online learning system is housed and stored within data servers with Amazon Web Services (AWS). This data is SALT encrypted in transit and at rest, this is detailed in the EDClass GDPR policy and stated previously in this document.

Institutional contact data of school/ academy/ local authority colleagues is processed in Zoho CRM for customer service purposes, to help deliver effective customer service, advice and guidance on the EDClass system. For this to be achieved the data held is educational colleague:

- Forename
- Surname
- Contact Telephone Number/ extension during school working hours (if different from school/ academy/ local authority telephone number
- Contact Institutional email address (for example name@school/academy/local authority.org)
- School Address
- School/ Academy/ local authority Telephone Number

EDClass Ltd has conducted thorough due diligence checks and a DPIA with Zoho Inc as part of the onboarding process and for ISO preferred suppliers' standards. More information regarding Zoho Inc can be seen via the website.

https://www.zoho.com/security.html
https://www.zoho.com/crm/gdpr/

Right to be forgotten:

People under the age of 16 cannot directly ask EDClass Ltd to have the right to be forgotten, but the contract holder (controller) can ask on behalf of an individual. Being an educational establishment where data may be needed in a legal defence, this data will be stored in a safe encrypted at rest area for 7 years. If known the student is a LAC (looked after child) this data will be kept for 75 years, in accordance with The Limitations Act 1980. All data is soft deleted and archived on September 1st after leaving their educational establishment, and only selected individuals with enhanced security access within EDClass Ltd will be able to recover data. After the allotted time span explained in this policy, the data is then permanently deleted and evidence of the database deletion/ destruction certificate and log can be viewed up on request.

Returning of records:
ALL teacher/ teaching interaction and engagement is recorded and saved by EDClass Ltd. These recordings are saved using the AWS S3 bucket structures. Each contract/ school/ academy/ local authority will be provided with an AWS S3 bucket. Access credentials for the S3 bucket will be granted to the authorised personnel named by the school/ academy/ local authority. ALL processing with the S3 buckets are logged.
The S3 buckets are archived for the timespan as outlined under the "right to be forgotten" sub heading within this GDPR policy.

End of contract and Deletion of records:
The following steps can be found in the EDClass Ltd "Life Cycle and Disposal Policy" (IS-POL 007).

The first step taken by EDClass Ltd is to archive *ALL* data once an educational establishment has been relinquished from or has ended their contract, this complies with the EDClass Ltd safeguarding policy and "right to be forgotten" clause within this document. When the term has lapsed, the next stage is for permanent deletion of records within the database.

When a database is permanently deleted from the EDClass Ltd databases a copy of the steps to ensure deletion are copied/ print screen and shown as evidence, because once an item from the database is deleted it is not possible to show an instance of data which subsequently is not present.

Subject Access Request:

At any point an individual or company have rights under section 7 of the DPA to request from EDClass Ltd all information held on them as a company or individual. EDClass Ltd will acknowledge this request within 5 days and supply the information within 28 days. Where data is supplied electronically there will be no additional cost, however if requested hard copy, this will be sent by special delivery and there will be a standard administration charge of £10 and a maximum of £50 dependent on the size/ amount of electronic/ printed data.

Data can only be requested in writing by the controller and commissioner of the EDClass Ltd Service Level Agreement, which can be supplied encrypted in .pdf format or sent as hard paper copy.
This data is not shared with any other party.

ICO registered

Registration Number **ZA783019**

Cyber Essentials Certified
https://edclass.com/cyber-essentials

ISO Standards: (certificates can be seen upon request)
ISO 9001
ISO 21001
ISO 27001

Up-to-date Data GDPR certificates for staff can be viewed on request.

All hardware and software security incidents incurred by users are those set out and adhered to by the educational establishment's Information and/ or digital policies.

Yours Sincerely

Sam Warnes

Managing Director and Creator of EDClass Ltd