

## Privacy and Data Protection Policy

### Primary and Secondary School Support Packages

#### Who is Speech Link Multimedia Ltd?

Speech Link Multimedia Ltd is a private limited company. Registered Office: Canterbury Innovation Centre, University Road, Canterbury, Kent CT2 7FG.

Tel 0333 577 0784. Email [dataprotection@speechlink.co.uk](mailto:dataprotection@speechlink.co.uk). Our company registration number is 504452. Our ICO notification number is Z9552034.

#### Data processor:

The conclusion of advice obtained is that we are a data processor in the context of our primary and secondary school support packages.

#### Basis for processing:

We process data under instruction from the school acting as data controller and take commensurate precautions with the data we process to ensure the rights of the data subject are not compromised.

#### Purpose of processing:

We provide a support service to schools, processing data under instruction from the schools to assist them with assessing and supporting their pupils' speech and language.

#### Special category data:

In the context of the primary and secondary school support packages we do not process special category data as defined by GDPR Article 9. However, the Department for Education are on record as requesting that schools treat information such as SEN status, English as an Additional Language etc. as if it were special category data. We will support the efforts of the school to process this data as if it were special category data.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/747620/Data\\_Protection\\_Toolkit\\_for\\_Schools\\_OpenBeta.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/747620/Data_Protection_Toolkit_for_Schools_OpenBeta.pdf) Final paragraph p22

#### What personal data do we collect?

1. Information about our users:
  - a. Email address
  - b. Forename and Surname
  - c. Role
  - d. Place of work
2. Information about school pupils. We collect the following standard information about pupils added to our support package website in order to perform the service we are contracted to provide:
  - a. Forename and Surname
  - b. Date of Birth
  - c. SEN status
  - d. English as an Additional Language (EAL)
  - e. Gender

- f. Pupil Premium or other indicator of social deprivation
- g. School year
- h. Form
- i. Other fields which are determined by the individual school

### Do we ever share personal data?

Personal data relating to users or identifiable data relating to school pupils is never shared with anyone except in the instances below:

1. We will share data where instructed to do so by a school
2. Where a child moves between two subscribing schools, we will at the written request of *both* schools transfer the child's assessment and progress data between the two schools.
3. For primary schools, users with a support service log-in can view individual results for a child in a school they are supporting however name and date of birth are not shared. The school must explicitly share a reference number with the support service in order for the service to identify the pupil.
4. In relation to primary school data: local authorities, academy trusts or other such school groupings can be given a log-in to allow the viewing of reports containing *aggregate* data. Individual pupils are not identified in these reports
5. We will share data if required to do so by a legitimate law enforcement agency

### How do we keep your data secure?

We take appropriate steps to maintain our school contact and pupil information in a secure environment to prevent unauthorised use. These measures include encryption, access restriction and physical security.

1. All data sent between a web browser and our server is encrypted in transit
2. All personally identifiable pupil data is encrypted at rest in the database
3. Our web servers reside in a highly secure ISO27001 certified data centre
4. All our staff have an up to date enhanced DBS check
5. We have physical security in place at our offices including CCTV and security patrols
6. We have protocols in place to ensure data is handled in an appropriate manner
7. All data is stored within the United Kingdom
8. Other than our ISO27001 UK based data centre provider we do not sub-contract data processing, we will inform you in writing should this change.
9. All staff sign a non-disclosure agreement relating to their employment and are subject to a duty of confidence.

### How can you keep your data secure?

1. Do not share your access details.
2. Where you use the PIN access system ensure the superuser removes staff members who have left the school.
3. If you do not use the PIN access system let us know when a staff member who previously had access to the website leaves the school.
4. Log out or lock the screen if you leave your computer unattended.

5. Don't leave a record of your login details (e.g. post-it note) near the computer.
6. Remember we will never call you to request your access details.

### What choices are there about how the data is used?

1. Information about our users. We need to be able to contact the users of our support packages at a school in order to fulfil our contract with the school. We therefore must retain email and telephone contact details, the address of the school and the names of individual users.
2. Other contact with users, about further support packages for example, is via an opt-in to our email newsletter. Should you opt-in to our newsletter and then wish to change your mind you can unsubscribe using the link in the newsletter, call the Help Desk at + 44 (0)333 577 0784, or email us at [office2@speechlink.co.uk](mailto:office2@speechlink.co.uk).
3. Information about pupils. In order to provide the support service to the school we need access to the data listed above under "What Personal Data do we collect?"
4. The above items 1 and 3 are the minimum required in order for us to be able to supply a service to you. You have the right to request that your data is not processed in this way at which point we would be unable to supply the service.

### Data subject access

1. School staff and other users may request a copy of any information held about them by writing to: Speech Link Multimedia Ltd, Canterbury Innovation Centre, University Road, Canterbury, Kent CT2 7FG
2. Where a request is received from a pupil (or their legal guardian) whose details have been entered on our systems by the school we will in the first instance direct the request back to the school as the data controller.

### Default Data Retention - Primary School Support Packages

The default data retention period is one year after the pupil has left primary school. So as the pupil moves into the second year of Secondary School (Y8 E&W, S2 Scot, Y9 NI) the identifying link is removed from the record so the information is no longer personally identifiable and can no longer be linked to the pupil – **this process cannot be reversed** and is our process for anonymising data, thus rendering it to be no longer personally identifiable information.

The residual anonymous information is also unlinked from the original school and cannot be located more specifically than the county in which it originated. We retain the completely anonymous information for averaging during research.

The retention period is ultimately dictated by the school as Data Controller. If a school wishes the data relating to its pupils to be unlinked sooner, such as when the pupil leaves the school, we can do so. We require a written request from the school to do this. In this context we remind all users that confidentiality is one part of data security, **integrity and availability are also important** especially with regard to records which may be used to show evidence of a level of need.

### Default Data Retention - Secondary School Support Packages

The default data retention period is until the pupil enters Year 11 (England and Wales), S5 (Scotland) or Y12 (NI) . So as the pupil moves into the above stated year the identifying link is removed from the record

so the information is no longer personally identifiable and can no longer be linked to the pupil – **this process cannot be reversed** and is our process for anonymising data, thus rendering it to be no longer personally identifiable information.

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### Data Retention – when a school subscription lapses

As we act only under instruction from the school as Data Controller, for the avoidance of doubt if a school wishes all its pupils' data to be unlinked at the point it stops subscribing it must explicitly request this in writing. If this is not done the default retention period will apply. We make this stipulation to avoid the case where a school's subscription lapses accidentally and it later wishes to re-subscribe, the school would otherwise find all its data deleted when it regained access.

Information relating to school staff (this is confined to name, position and email address) will be deleted one year after a subscription lapses. During that year it remains in the database should you wish to re-subscribe. You may request deletion of this information at any time.

### Assisting the data controller

We will assist the school, in its capacity as a data controller, in meeting its GDPR obligations.

We always decline requests which we interpret as likely to infringe GDPR or UK data-protection law.

Due to the existence of misunderstanding about and over-interpretation of GDPR regulations we reserve the right to ascertain via a third party whether any specific request truly represents a data controller's obligations under GDPR. Where in the opinion of the third party a request does not form part of the data-controller's obligations we reserve the right to decline the request if we consider it unreasonable, taking into account the nature of the processing and the information available to us.

We will assist with audits and inspections wherever possible however we reserve the right to make a charge for these.

### Cookies - How do we use cookies on our websites?

Cookies are small text files that are placed on your computer when you access a website. These allow websites to do several important things, including remember what's in your shopping basket and which pages you have visited.

There are two main types of cookies:

1. Session Cookies – used to keep track of what is happening on any particular visit to the website. Keeping you logged in or keeping track of a shopping basket are two typical uses. Session cookies are removed from your browser when it is closed, sometimes before that if

your session “times out” or “expires”. This type of cookie cannot identify you and does not need permission.

2. Persistent Cookies, as their name suggests these cookies persist after your browser is closed and are still there for reading by the site that set them when you visit again or when you visit a site which links to the site which set the cookie. These cookies can be used to track your behaviour from site to site and serve up “customised” advertisements. They are also used to remember you so that you don’t need to enter all your details again. This is the type of cookie which you accept or decline when visiting a web site

Speech Link Multimedia Ltd uses Session Cookies on its school support website, the website will not function without them.

We also use some persistent cookies. These cookies are set by third party services that we employ to do things such as check how our interface is being used and whether we can improve

We also use Google Analytics (GA) to analyse the use of this website and to provide reports which help us to tune it better for users. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users’ computers. The information generated relating to our website is used to create reports about the use of the website. Google stores and uses this information. Google’s privacy policy is available at [www.google.com/privacypolicy.html](http://www.google.com/privacypolicy.html). To opt out of being tracked by Google Analytics across all websites please visit: <http://tools.google.com/dlpage/gaoptout>.

Within our cookie information on the web site we refer to GA cookies and other persistent cookies as “Performance” cookies as they help us enhance the performance of the site.

We do not serve up advertisements or knowingly take part in any scheme that would allow your online behaviour to be tracked for the purposes of identity discovery.

How to control cookies:

As of 24th May 2018 when you first visit our website we will ask for your consent to use of cookies. We will record your choice and will not request you to choose again on the specific browser installation you used to access the site. You can however change your mind at any time by going to the “Website Cookie Preferences” link in the footer of the website.

If you wish to prevent cookies being set before you visit our or other websites, you can set your browser to block cookies. Most browsers allow you to do this in their settings, be careful not to block session cookies, this would stop many websites working.

If you would like to know more about cookies, please visit the [ICO website](#).

### What happens when I follow links to other sites?

If you follow links to other sites from our website your data will be subject to the privacy policies of those sites. You should refer to these policies before providing your data.

## Where do we process data?

We process data at our registered offices at Canterbury Innovation Centre, University Road, Canterbury, Kent CT2 7FG.

We apply UK data protection law and the GDPR conditions to our processing.

## Making a complaint

You can contact us at the above address, alternatively the supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO. The ICO Helpline number is 0303 123 1113