

Remote Learning Options: Data Protection Considerations & Guidance

Each school's systems, tools, approach and community will be different and so this provides general points for more detailed discussion with your DSL and DPO. Those highlighted in yellow are options we are currently using.

	Synchronised	Remote live lessons	Remote pre-recorded lessons	Directed online learning	Hard copy learning
Method	Teacher delivers in school to a live class, pupils studying remotely login to view and participate live.	Teacher delivers lesson to camera (either from school or home), pupils login to a platform to participate in the lesson.	Teacher delivers lesson to camera with no pupil presence. This is recorded and made available for pupils to access online, in their own time.	Teacher directs pupils to 3 rd party on-line resources or tools such as TT Rockstars (login) or Oak National Academy (freely available)	Teacher provides pupils with resources to complete entirely off-line learning eg textbooks, worksheets
Data subjects	Teacher and all participating pupils, both remote and live. Possibly parents if their email address etc is used to invite and access.	Teacher and all participating pupils, both remote and live. Possibly parents if their email address etc is used to invite and access.	Teacher. Possibly pupil / parent if login is required.	Where login is required teacher / pupil / parent	
Platform	GSuite via Google classroom or O365 via Teams preferred. Schools must have fully embedded the platform, (including pupils issued with school email addresses and staff fully trained on privacy settings), appropriate codes of conduct and DPIAs in place.	GSuite via Google classroom or O365 via Teams preferred. Schools must have fully embedded the platform, (including pupils issued with school email addresses and staff fully trained on privacy settings), appropriate codes of conduct and DPIAs in place.	Multiple options available – pupils/parents may be able to access by login to a secure part of the school website. May need DPIA, but not necessarily if no pupil data is shared. Pupil & Workforce PNs must include this.	Multiple options available – pupils/parents may be able to access by login and therefore sharing personal data so may need DPIA. Pupil & Workforce PNs must include this.	

	Pupil & Workforce PNs must include this. N.B where schools are not issuing pupils with school email accounts Synchronised learning poses increased personal data sharing risks.	Pupil & Workforce PNs must include this. N.B where schools are not issuing pupils with school email accounts Synchronised learning poses increased personal data sharing risks.			
Risk/Concerns	<ol style="list-style-type: none"> 1. Pupils may be able to see each other 2. Pupils will have access to each other's email used for login 3. Pupils may have sight of the inside of other pupils' homes 4. Unauthorised screenshotting / recording and distributing any of the above 5. A safeguarding incident may occur 6. Accessibility 	As synchronised: 3. pupils may have sight of the inside of teacher's homes	All concerns documented in synchronised are mitigated by this method	<ol style="list-style-type: none"> 1. Pupils may have access to each other's email if serve as usernames 	
Control mechanisms	<ol style="list-style-type: none"> 1. Pupils are already known to each other so not an issue 2. If a fully embedded Remote Learning Platform, pupils will use sch email address which they all have access to in their global address book 			<ol style="list-style-type: none"> 1. Ensure pupils use school email addresses to log on 2. Staff ensure they understand privacy setting options for 	

	<p>3. For pupil camera settings, see recording and consents sections below and seek advice from DSL and DPO before commencing.</p> <p>4. Bullying / Behaviour / Code of Conduct (see model Remote Learning Policy: Pupil Code of Conduct; Remote Learning Addendum) may need amending to reflect expectations / possible sanctions</p> <p>5. Staff follow school safeguarding policy and processes (this may include pausing the lesson to seek assistance as would be the case if such an incident were to occur in a classroom)</p> <p>6. Sch have ensured all pupils expected to so engage have exclusive access to a laptop / other appropriate technology</p>		the tool and apply appropriately.	
Official recording for future use	<p>If the recording captures pupil images, contributions, or their (or their parent's) login details, the recording is personal data and therefore PNs and the Retention Schedule will need to be amended to reflect this. If the recording can be so structured as to only capture the teacher's delivery, this is mitigated.</p>	N/A		
Consent to recording	<p>Primary: Consent for publishing images rests with parents.</p> <p>Secondary: although capable of giving consent after 12 in theory, we still ask for parental consent up to end of KS4.</p> <p>In all cases seek advise from DSL and DPO before commencing.</p>			