

Education City Privacy Notice for Schools

Your Personal Data

What information do we need?

Argyll and Bute Council will act as the 'Data Controller' in regard to the personal data you provide to us. The Data Protection Officer can be contacted at the Council's headquarters is at Kilmory, Lochgilphead PA31 8RT. The email address is: data.protection@argyll-bute.gov.uk

Castlehill Primary School will use information provided by you when you registered for school to register you for an account with Education City, a digital learning resource, in order to support their education. The personal information will include forename, initial of surname and DOB. No special category data will be shared.

Why we need this information?

Your information is being collected to help assist in raising literacy and numeracy.

If you do not provide this information then your school will provide alternative means of recording this information. There are benefits to you and the school in using this software. We will not collect any personal data from you that aren't needed for delivery of those services.

The legal basis for collecting your information in these circumstances are:

Article 6(1)(e) – Public Task on the basis of the legal obligation placed on the Education Authority to track and monitor pupil progress and to raise attainment in terms of the undernoted legislation:

- * Education (Scotland) Act 1980
- * Education (Additional Support for Learning) (Scotland) Act 2009
- * Scottish Schools (parental Involvement) Act 2006
- * Standards in Scotland's Schools etc. Act 2000
- * Children and Young People (Scotland) Act 2014

What we will do with your information?

The information we collect from you will be processed by staff in the United Kingdom. Email communications between schools and Education City will be routed through email systems held in the USA. Although America is not subject to the same data protection laws as in the UK, Argyll and Bute Council has followed nationally agreed procedure to ensure Education City provide an adequate level of protection in accordance with UK data protection laws.

Your information will be shared with the recipients or categories of recipients as detailed below:

What we will do with your information	
Who we will share with	Reason for Sharing
Parents/Carers	To involve them in your education
Education City and its sub-processors	Marketo (www.marketo.com) – provide marketing services that allow us to manage teachers' and administrators' communication preferences, including delivery and tracking of email campaigns. Whatfix (www.whatfix.com) – provide our in-product help and support services to teachers and administrators. We use cookies and anonymised user IDs, no identifiable account information is shared.

You should also be aware that your data will be stored on servers located within the United Kingdom. Correspondence is kept in email format for the current year plus 3 archived years. We

will take all reasonable steps to ensure that your data is kept securely and more information on how we do this is provided on the Council website (www.argyll-bute.gov.uk) or can be provided in paper format on request to Castlehill Primary School, 01586-553446.

How long will we keep your information?

We will usually keep your information for 5 years following your leaving date, after this period it will be destroyed under secure arrangements if it is no longer required for the lawful purpose(s) for which it was obtained. For children and young people who are currently or have been Looked After and Accommodated by a local authority, files will be kept indefinitely in line with the requirements and recommendations of the Scottish Child Abuse Inquiry (SCAI). More information on our retention schedule is provided on the Council website (www.argyll-bute.gov.uk) or can be provided in paper format on request to School Support 01369 704000.

Personal data will be held in Education City for as long as children are engaging with the service. Once an account is deleted the personal data associated will be deleted.

Education City will delete accounts after 2 years' inactivity. The account will be archived for no longer than 2 years. Parents/guardians can request for personal information to be deleted if the child is no longer participating in the programme. Schools will be responsible for ensuring that accounts for pupils no longer in their school are identified to Education City.

Automated Decision Making

The resource has been specifically designed to provide automated marking and learning pathways for the assessments. The results of these are dependent on the student answering questions correctly or incorrectly. There is no facility for human intervention in the automated marking or Revision resources prescribed. The Education City product undergoes stringent testing with industry professionals to ensure it is working correctly. Schools can raise any issues about the product directly with Education City.

Your Rights

When you provide information to the Council, you will have the following rights:

- to withdraw consent at any time, where the legal basis specified above is consent
- to lodge a complaint with the Information Commissioner's Office
- to request access to your personal data
- to data portability, where the Legal basis specified above is i) consent or ii) performance of a contract
- to request rectification or erasure of your personal data, as so far as the legislation permits

If you would like this document in an alternative format, such as a hard copy, please contact **[school name and phone number]**.

Information Commissioner's Office

The ICO is the UK's independent body set up to uphold information rights.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow,
Cheshire, SK9 5AF
Telephone: 0303 123 1113
Email: casework@ico.org.uk

The Information Commissioner's Office –
Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0303 123 1115
Email: Scotland@ico.org.uk