

School/ Division/Team:	Sulby
Project Title:	Zoom
Lead/Contact Officer:	Headteacher



Before you start, do you need a **Privacy Impact Assessment? (PIA) – complete these **pre-screening questions**:**

(These questions are intended to help you decide whether a PIA is necessary. Answering 'yes' to any of these questions is an indication that a PIA would be a useful exercise.

[You can expand on your answers as the project develops if you need to. You can adapt these questions to develop a screening method that fits more closely with the types of project you are likely to assess].

Questions:	Yes / No
Will the project involve the collection of new information about individuals?	Y
Will the project compel individuals to provide information about themselves?	Y
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	Y
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	Y
Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	N
Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	N
Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.	N
Will the project require you to contact individuals in ways that they may find intrusive?	N

Privacy Impact Assessment

Step one: Identify the need for a PIA

Explain what the project aims to achieve:	Implement Zoom based chat sessions and meetings												
Benefits to the organisation:	Allows direct contact with data subjects – children, young people and students												
Benefits to individuals:	Continuation of the learning experience												
Benefits to other parties:	Educational development continues												
Other relevant documents related to the project:	<p>https://www.privacyshield.gov/participant?id=a2zt0000000TNkCAAW&status=Active</p> <p>https://zoom.us/privacy</p> <p>Risk assessment and other documents provided by Sulby Head teacher – to be amended as needed. Generic versions attached at the appendix</p> <p>Info relating to Zoom:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Type of Data</th> <th style="width: 33%;">Examples</th> <th style="width: 33%;">Zoom Uses it to</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Information that identifies you</td> <td>For customers: Account owner name, billing name and address, payment method</td> <td>Create a customer account</td> </tr> <tr> <td>Your name, username and email address, or phone number, when you use this information to access or use our services</td> <td>Provide Zoom services</td> </tr> <tr> <td>The phone number a Zoom Phone user dials</td> <td>Communicate with a customer</td> </tr> </tbody> </table>			Type of Data	Examples	Zoom Uses it to	Information that identifies you	For customers: Account owner name, billing name and address, payment method	Create a customer account	Your name, username and email address, or phone number, when you use this information to access or use our services	Provide Zoom services	The phone number a Zoom Phone user dials	Communicate with a customer
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	The phone number a Zoom Phone user dials	Communicate with a customer											

			Respond to requests for support
	Other account data	Your phone number (if you choose to put it in), language preference, password (if SSO is not used), title, department	Create a customer account Provide Zoom services
	Customer content: information you or others upload, provide, or create while using Zoom	Cloud recordings, chat / instant messages, files, whiteboards, and other information shared while using the service, voice mails	Provide Zoom services* Store chat logs (for delivery and so you can review and search chat history) Store recordings, if explicitly requested by the host or Customer Store voice mail for Zoom Phone
	Type of Data	Examples	Zoom Uses it to
	Technical information about your devices, network, and internet connection	IP address, MAC address, other device ID (UDID), device type, operating system type and version, client version, type of camera, microphone or speakers, connection type, etc. The phone number of a person making a call using Zoom services (e.g. Zoom Phone)	Connect you to and optimize your experience using our services Provide customers dashboards and reports Respond to requests for support

			<p>Monitor performance of our data centers and networks</p> <p>Conduct anonymized, aggregated analytics to improve Zoom’s service performance</p>
	Approximate Location	To the nearest city (we do not “track” your specific location)	<p>Connect you to the nearest data center</p> <p>Comply with privacy and other laws – for example, so we can provide you with the right notices for your area</p> <p>Suggest choices such as language preferences</p> <p>Monitor performance of our data centers and networks</p> <p>Respond to requests for support</p>
	Information about how you use Zoom (this is NOT information or content you share in your meetings or in chats)	Did you use VoIP or a phone call?	Optimize your Zoom experience

		Did you shift from the mobile client to the desktop?	Respond to requests for support Conduct anonymized, aggregated analytics to improve Zoom's performance.
	Setting and preferences chosen by the user	Join with video off Require meeting password Enable waiting room Do not allow screen sharing other than host	To provide you choices for how you use Zoom
	Metadata	Duration of the meeting / Zoom Phone call Email address, name, or other information that a participant enters to identify themselves in the meeting Join and leave time of participants Name of the meeting Date / time that meeting was scheduled Chat status (unless a setting is actively chosen by user)	Provide Zoom services Provide customers dashboards and reports Respond to requests for support

	Call data records for Zoom Phone
Why the need for a PIA was identified:	Zoom raises a series of issues from a privacy perspective as well as security issues. Information is currently routed through servers in China.

Step two: Describe the information flows

Collection:	Only with consent and agreement should people sign up to this service. People will need to sign on themselves recognising the risks around data sharing with Facebook.
Use:	Online learning sessions only – no sensitive information should be discussed. People also need to be aware that 'Zoom bombing' is a possibility and that appropriate passwords, procedures and security
Deletion	Data will be deleted at the end of use but in the August following a pupil's leaving school.
Number affected: (anticipated)	KS 2 pupils 106 106 parents
Flow diagram: <i>(Nb. A simple arrow/flow diagram is helpful, if possible)</i>	

Consultation requirements (*if applicable)

Practical steps to ensure that risks are identified:	Risks identified: Servers based in China Zoombombing Data shared with Facebook Encryption – not end to end Password protecting meetings
Practical steps to ensure that privacy risks are addressed:	People need to be made aware of what having servers in China means in terms of monitoring. With protective measures in place 'zoombombing' should be avoided – meetings should be password protected and the link sent out and not shared. Updated apps / software needs to be used – again this possibility needs to be highlighted to data subjects and their parents. No sensitive information should be discussed using this service. Links and passwords should not be shared widely.
Internal consultation with:	Staff
External consultation with:	Head KPS Parents DESC DPO Andrew Shipley
Consultation methodology (<i>link to the relevant stages of the project management process</i>):	Consultation with staff to discuss feasibility. Consultation with parents to seek interest and subsequent permission Consultation with DESC DPO
Dates of consultation	
Consultation 1:	28th April 2020
Consultation 2:	1 st May 2020

Step three: Identify the privacy and related risks

Identify the key privacy risks and the associated compliance and corporate risks. Larger-scale PIAs might record this information on a more formal risk register.

Annex three can be used to help you identify the DPA related compliance risks.

Privacy issue	Risk to individuals	Compliance risk	Associated organisation / corporate risk
Disclosure of personally identifiable information (PII)	Information shared with 3 rd parties eg Facebook	Non-compliance with DPA	Non-compliance with DPA or other legislation can lead to sanctions, fines and reputational damage
Data breach esp as encryption – not end to end	PII shared with unknown parties	Non-compliance with DPA	Non-compliance with DPA or other legislation can lead to sanctions, fines and reputational damage
Servers based in China	PII subject to possible review	Non-compliance with DPA	Non-compliance with DPA or other legislation can lead to sanctions, fines and reputational damage
Data being used for purposes other than those it was collected for.	Users have a right to understand how we will use the PII	Non-compliance with DPA	Non-compliance with DPA or other legislation can lead to

			sanctions, fines and reputational damage
Data being held outside the EU and therefore subject to other jurisdictional legislation	Data protection laws may not be equivalent to IOM, and therefore may not have the same controls	Non-compliance with DPA	Non-compliance with DPA or other legislation can lead to sanctions, fines and reputational damage
Not specifically a privacy issue:			
Zoombombing	Subject to unpleasant materials		Complaints and upset caused. Reputational damage

Step four: Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (eg the production of new guidance or future security testing for systems).

Risk	Solution(s)	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?

Information shared with 3 rd parties eg Facebook	Up to date software should be installed. Data subjects to be informed that this is a possibility	Accepted	Proportionate – data subjects should not suffer detriment through not using this service if they choose
PII shared with unknown parties	No sensitive personal data should be shared. Those signing up to the service should be made aware that personal information will be needed	The person using the service either accepts this or not – it is their choice.	Proportionate – data subjects should not suffer detriment through not using this service if they choose
PII subject to possible review	No sensitive personal data should be shared. Those signing up to the service should be made aware that personal information will be needed – people need to be informed that what they say / do may be monitored as routed through China and also info stored in US	The person using the service either accepts this or not – it is their choice.	Proportionate – data subjects should not suffer detriment through not using this service if they choose
Users have a right to understand how we will use the PII	Limited PII used by school / UCM – it is the service being used. Privacy notice to be updated with	The person using the service either accepts this or not – it is their choice.	Proportionate – data subjects should not suffer detriment through not using this

	suitable information and warnings		service if they choose
Data protection laws may not be equivalent to IOM, and therefore may not have the same controls	Privacy shield in place. Privacy notice for Zoom recognises the GDPR principles and privacy and security are areas that they are working on.	The person using the service either accepts this or not – it is their choice.	Proportionate – data subjects should not suffer detriment through not using this service if they choose

Step five: Sign off and record the PIA outcomes

Who has approved the privacy risks involved in the project?

What solutions need to be implemented?

Risk:	Approved solution:	Approved by (Headteacher / Principal or designate):
Information shared with 3 rd parties eg Facebook	Up to date software should be installed. Data subjects to be informed that this is a possibility	Yes
PII shared with unknown parties	No sensitive personal data should be shared. Those signing up to the service should be made aware that personal information will be needed	Yes
PII subject to possible review	No sensitive personal data should be shared. Those signing up to the service should be made aware that personal information will be needed – people need to be informed that what they say / do may be monitored as routed through China and also info stored in US	Yes
Users have a right to understand how we will use the PII	Limited PII used by school / UCM – it is the service being used. Privacy notice to be updated with suitable information and warnings	Yes
Data protection laws may not be equivalent to IOM, and therefore may not have the same controls	Privacy shield in place. Privacy notice for Zoom recognises the GDPR principles and privacy and security are areas that	Yes

	Zoom are working on. This is to be highlighted in the updated privacy notice	

SIGN OFF

DESC DATA PROTECTION OFFICER

**DPIAs should be signed, sent and retained by
> DPO-desc@gov.im <**

5th May
2020

Data Controller
signature(Headteacher) electronic Date: _____

DPO-DESC signature: _____ Date: _____

SIRO signature: _____ Date: _____

Step six: Integrate the PIA outcomes back into the project plan

(Who is responsible for integrating the PIA outcomes back **into the project plan** and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns that may arise in the future?)

Action to be taken	Date for completion of actions	Responsibility for action
Advise that the most up to date software should be used – patches and updates installed	28 th April 2020 On release	Users
When personal data of a sensitive nature starts to be shared the meeting should be terminated and continued more securely, if appropriate – NB safeguarding responsibilities and also protecting staff.	Immediately	Host (Staff member of school)
Privacy notice to be updated to highlight risks and issues	28 th April 2020	Head
Consent to be sought before using the service	5 th May 2020	

Contact point for future privacy concerns:
Headteacher / Principal DPO-DESC

Linking PIA to the GDPR privacy principles

Answering these questions during the PIA process will help you to identify where there is a risk that the project will fail to comply with the GDPR/DPA or other relevant legislation, for example the Human Rights Act.



Principle 1

1. **Lawfulness, fairness and transparency**

Transparency: Tell the subject what data processing will be done.

Fair: What is processed must match up with how it has been described

Lawful: Processing must meet the tests described in GDPR
[article 5, clause 1(a)]

Have you identified the purpose of the project?

Yes – to provide on-going contact with pupils and students

How will you tell individuals about the use of their personal data?

Privacy notice; consent form and email

Do you need to amend your privacy notices?

Yes – before using the service

Have you established which conditions for processing apply?

Consent is being used – some parents may not want their children / young person using this service.
If you are relying on consent to process personal data, how will this be collected, and what will you do if it is withheld or withdrawn?
By email. It is for individual establishments to establish other means of communicating with their students if they are able eg email.
Our organisation (CO) is subject to the Human Rights Act, please also consider:
<ul style="list-style-type: none"> Will your actions interfere with the right to privacy under Article 8?
No
<ul style="list-style-type: none"> Have you identified the social need and aims of the project?
Yes – to maintain contact with data subjects during this period of lockdown
<ul style="list-style-type: none"> Are your actions a proportionate response to the social need?
Yes; but there are recognised issues with the service so explicit information needs to be provided.
Principle 2
2. Purpose limitations
Personal data can only be obtained for “specified, explicit and legitimate purposes” [article 5, clause 1(b)]. Data can only be used for a specific processing purpose that the subject has been made aware of and no other, without further consent.
Does your project plan cover all of the purposes for processing personal data?
Yes – see additional sheets for examples
Have you identified potential new purposes as the scope of the project expands?
No
Principle 3

3. Data minimisation

Data collected on a subject should be “adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed”. [article 5, clause 1(c)]

I.e. No more than the minimum amount of data should be kept for specific processing.

Is the quality of the information good enough for the purposes it is used?

Yes; it is personal choice whether people sign up but it must be made clear what the risks are

Which personal data could you not use, without compromising the needs of the project?

Limited information is needed by the person controlling the meeting although they are able to access more information than they need due to the set-up of Zoom as it stands.

Principle 4

4. Accuracy

Data must be “accurate and where necessary kept up to date” [article 5, clause 1(d)]

Baselining ensures good protection and protection against identity theft. Data holders should build rectification processes into data management / archiving activities for subject data.

If you are procuring new software does it allow you to amend data when necessary?

N/A

How are you ensuring that personal data obtained from individuals or other organisations is accurate?

N/A

Principle 5

5. Storage limitations

Regulator expects personal data is “kept in a form which permits identification of data subjects for no longer than necessary”. [article 5, clause 1(e)]

I.e. Data no longer required should be removed.

What retention periods are suitable for the personal data you will be processing?
N/A – up to individuals to delete their accounts as they see fit
Are you procuring software that will allow you to delete information in line with your retention periods?
N/A
Principle 6
6. Integrity and confidentiality
Requires processors to handle data “in a manner [ensuring] appropriate security of the personal data including protection against unlawful processing or accidental loss, destruction or damage”. [article 5, clause 1(f)]
Do any new systems provide protection against the security risks you have identified?
Security is being developed as part of the ongoing development of Zoom
What training and instructions are necessary to ensure that staff know how to operate a new system securely?
Some input may be needed to ensure meetings are password protected and to show how links are passed out.

Appendix – Many thanks to Kewaigue for all the work that they have done on this.



RISK ASSESSMENT
Zoom sessions for chi

Initial web message / email:

I hope this email finds you well. There is so much concern and uncertainty at the moment, but I hope the time you are spending together as a family, is proving enjoyable.

There will be some children who are understandably scared and worried at the moment. The UK Children's commissioner has issued a children's guide to coronavirus which aims to answer children's questions, let them know how to stay safe, protect other people and how to help them make the best of their time at home. The guide can be found

at: <https://www.childrenscommissioner.gov.uk/publication/childrens-guide-to-coronavirus/?fbclid=IwAROnUybGxeCx00Uu3XLbORpXKNWX8JLf8IBsyZteYzveMF5xacfwUxPF4-k>

I'm conscious that many of the children are missing their friends and teachers. Over the last week or so, I have been contemplating the use of video conferencing to help bring our school community together a little more. Staff and I have been trialling sessions using a number of platforms, but due to the ability to schedule a secure and private meeting 'Zoom' seems to offer the best option to potentially do this. I'm aware of press coverage today which has brought the platform into close scrutiny, but from what I have read, it appears the company has issued assurances around security. There are several safety features that will be utilised by staff during any potential conference that children are invited to. Details of these can be found here:

https://blog.zoom.us/wordpress/2020/03/27/best-practices-for-securing-your-virtual-classroom/?_ga=2.106089219.1069986929.1585673784-223714122.1585561196

If used correctly, this provides an opportunity for some short fun sessions to be delivered by some of the Sulby School staff, in addition to the learning packs we are issuing. There is of course no obligation for the children to join the sessions and some children and/or parents will prefer not to take part. However, if this is of interest, please can you reply to this email with the following information to enable me to gauge support for the proposal.

I would like / not like details of planned video conference sessions for my child's year group

I do / do not consent for my child to take part in a planned session hosted by a member of Sulby School staff

To participate in a session, your child will need access to either a phone, tablet or computer with a working camera, microphone and speaker and a decent internet connection. 'Zoom' will also need to be preinstalled. The app can be downloaded from Apple App store and Google Playstore. If this goes ahead, a protocol will also be issued for all users prior to a conference session, to ensure it is successful and safe.

Follow up web message / email:

Dear Parents,

Thank you for your response and permission for your child to take part in a 'Zoom' video conference session. I sincerely hope that these sessions go well and are something the children enjoy.

This is new to all of us, so we might have some hiccups along the way!

To participate in a session, your child will need access to either a phone, tablet or computer with a working camera, microphone and speaker and a decent internet connection. 'Zoom' will also need to be preinstalled. The app can be downloaded from Apple App store and Google Playstore.

I'm very mindful of the security of any sessions, so I will ensure several safety features are used during a conference that children are invited to. The protocol for all users is as follows:

- All meetings scheduled by Sulby School staff will use the waiting room feature that prevents users from entering the meeting without first being admitted by the host.*
- Once everyone has joined the meeting or after 5 minutes of the session starting, we will 'Lock' the meeting so that nobody else can join.*
- Each meeting hosted by a member of staff will be password protected. This password will be issued by email to parents 15 minutes before each scheduled meeting. Please check your email for this.*
- Please ensure the first name of the child participating is correct before joining a session*
- All microphones will be muted on entry to the meeting. Please do not unmute unless asked to do so or the host does it for you.*
- Each meeting will be scheduled for a specific time and will usually last no more than 30 minutes. Do not accept any invitations to sessions at other times from people purporting to be a member of staff from Sulby School.*

- *If anything inappropriate occurs during a meeting, the meeting will be stopped immediately.*

The first conference will be on Monday at 10.00am for Year 6 children whose parents have given consent.

A separate email with a task for your child to prepare, will be issued for each class before the session.

I'm really looking forward to seeing the children next week!

Mr Jackson

Possible privacy notice amendments:

Covid-19 Zoom for remote sessions

In order to facilitate remote working <<school name>> are using a service called Zoom. Please be aware that there are privacy and security issues at present with this and we understand that you may not want to use this service. There is no obligation to do so. Some of the problems have been highlighted in the press and include:

Information routed through servers based in China – possible review of information;

Sharing of data with facebook – updated software should be used

Zoombombing – suitable passwords should be in place and links should not be shared

Encryption is not end to end - No personal information should be shared during sessions as the service is not properly encrypted.

Non-protected meetings – Only password protected meetings should be held.

The data the Zoom service collects and uses is as detailed below:

Type of Data	Examples	Zoom Uses it to
Information that identifies you	For customers: Account owner name, billing name and address, payment method	Create a customer account

	<p>Your name, username and email address, or phone number, when you use this information to access or use our services</p> <p>The phone number a Zoom Phone user dials</p>	<p>Provide Zoom services</p> <p>Communicate with a customer</p> <p>Respond to requests for support</p>
Other account data	Your phone number (if you choose to put it in), language preference, password (if SSO is not used), title, department	<p>Create a customer account</p> <p>Provide Zoom services</p>
Customer content: information you or others upload, provide, or create while using Zoom	Cloud recordings, chat / instant messages, files, whiteboards, and other information shared while using the service, voice mails	<p>Provide Zoom services*</p> <p>Store chat logs (for delivery and so you can review and search chat history)</p> <p>Store recordings, if explicitly requested by the host or Customer</p> <p>Store voice mail for Zoom Phone</p>

*Zoom does not monitor or use customer content for any reason other than as part of providing our services. **Zoom does not sell customer content to anyone or use it for any advertising purposes.**

Data that our system collects from you:

Type of Data	Examples	Zoom Uses it to
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<p>Technical information about your devices, network, and internet connection</p>	<p>IP address, MAC address, other device ID (UDID), device type, operating system type and version, client version, type of camera, microphone or speakers, connection type, etc.</p> <p>The phone number of a person making a call using Zoom services (e.g. Zoom Phone)</p>	<p>Connect you to and optimize your experience using our services</p> <p>Provide customers dashboards and reports</p> <p>Respond to requests for support</p> <p>Monitor performance of our data centers and networks</p> <p>Conduct anonymized, aggregated analytics to improve Zoom's service performance</p>
<p>Approximate Location</p>	<p>To the nearest city (we do not "track" your specific location)</p>	<p>Connect you to the nearest data center</p> <p>Comply with privacy and other laws – for example, so we can provide you with the right notices for your area</p> <p>Suggest choices such as language preferences</p> <p>Monitor performance of our data centers and networks</p> <p>Respond to requests for support</p>

<p>Information about how you use Zoom (this is NOT information or content you share in your meetings or in chats)</p>	<p>Did you use VoIP or a phone call?</p> <p>Did you shift from the mobile client to the desktop?</p>	<p>Optimize your Zoom experience</p> <p>Respond to requests for support</p> <p>Conduct anonymized, aggregated analytics to improve Zoom's performance.</p>
<p>Setting and preferences chosen by the user</p>	<p>Join with video off</p> <p>Require meeting password</p> <p>Enable waiting room</p> <p>Do not allow screen sharing other than host</p>	<p>To provide you choices for how you use Zoom</p>
<p>Metadata</p>	<p>Duration of the meeting / Zoom Phone call</p> <p>Email address, name, or other information that a participant enters to identify themselves in the meeting</p> <p>Join and leave time of participants</p> <p>Name of the meeting</p> <p>Date / time that meeting was scheduled</p> <p>Chat status (unless a setting is actively chosen by user)</p>	<p>Provide Zoom services</p> <p>Provide customers dashboards and reports</p> <p>Respond to requests for support</p>

	Call data records for Zoom Phone	
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Please be aware that there are privacy and security issues with Zoom. If you have any concerns regarding the use of Zoom please do not download the App or log on to the service.