

G Suite for Education Privacy Notice to Parents and Carers

1.1 Introduction

Cardiff Steiner School is using G Suite for Education for pupils and staff. G Suite for Education is a set of education productivity tools from Google including Google Classroom, Calendar, Docs and more, used by millions of students and teachers around the world.

At Cardiff Steiner School pupils can use their G Suite accounts to access learning content, complete assignments, communicate with their teachers, and learn digital citizenship skills.

G Suite for Education provides a secure learning intranet for our pupils and staff. Pupils are issued with a safe and secure login and are able to access their learning both in School and at home, allowing them to work between the two. Parents of our youngest pupils (below Class 6/7) are required to access and manage pupils' accounts for them using their child's log in.

G Suite for Education is available from any other computer with internet access. It is also available on other devices such as smartphones, iPads, etc.

Our pupil accounts have a tailored set of security settings to reflect the fact that the system is being used by a child or young person - they have a much higher security setting than our staff for example.

Pupils can submit many learning tasks and assignments completed at home using their G Suite for Education account. While pupils can share their work with other pupils and staff at the School, their settings do not allow them to share or receive from outside users @cardiffsteiner.org.uk unless we specifically allow for this (for example, a specific collaboration with pupils at another school).

Where pupils are issued with Gmail addresses the accounts are locked down to the school domain - @cardiffsteiner.org.uk - so that they can only use and send emails from their school email between their fellow pupils and staff. They cannot send emails outside @cardiffsteiner.org.uk or receive email from outside @cardiffsteiner.org.uk. Parental consent will be sought before making email accounts available to pupils below Class 10.

Please read this Privacy Notice to Parents and Carers carefully and let us know of any questions to gadmin@cardiffsteiner.org.uk. It provides answers to common questions about what Google can and can't do with a pupil's personal information, including:

- What personal information does Google collect?
- How does Google use this information?
- Will Google disclose my child's personal information?
- Does Google use student personal information for users in schools to target advertising?
- Can my child share information with others using the G Suite for Education account?

Information about online safety is available at hwb.gov.wales/onlinesafety and on the [School website](#)

1.2 Consent

Due to the impact of COVID-19 on education in Wales, and following the announcement by Welsh Government on 20 March 2020, Welsh Government has taken immediate steps to provide learners with access to online services. The Welsh Government believes that it is in the public interest to ensure every learner in maintained schools in Wales has full access to their hosted learning environment so that schools can use distance learning tools. These tools, which include G Suite for Education, have previously only been made available where learners or their parents/carers had given consent. However, from Monday 23 March 2020, every learner in maintained schools in Wales will be able to access these services. Schools will no longer rely on consent and instead will provide these services as part of their public task. Further information is available on the [ICO website](#)

The Welsh Government has been considering making this change for some time, but has brought forward the decision due to the unprecedented situation in Wales and the need to provide distance learning support to all learners. This decision has been reached following legal advice and the ICO's office in Wales has been informed.

In line with this, and on this basis, Cardiff Steiner School is making G Suite for Education available to all pupils in the School without relying on consent, and instead will provide these services as part of its public task. The School will create/maintain a G Suite for Education account for each pupil and allow Google to collect, use, and disclose information about each pupil only for the purposes described in this Privacy Notice. This decision will be reviewed once the current urgent situation has ended.

Parents, carers or learners who have serious data protection concerns have a right to object and should contact the School by email to gadmin@cardiffsteiner.org.uk explaining why the provision of G Suite for Education infringes on the learner's rights and freedoms. The School will weigh up whether providing access to G Suite for Education is outweighed by the gravity of the objection. Further information is available on the [ICO website](#)

1.3 Detailed Information

This notice describes the personal information Cardiff Steiner School provides to Google for these accounts and how Google collects, uses, and discloses personal information from students in connection with these accounts.

Using their G Suite for Education accounts, students may (if the School allows it) access and use the following 'Core Services' offered by Google (described at https://gsuite.google.com/terms/user_features.html) :

* = not currently used by students

- Gmail - students are only able to use email within @cardiffsteiner.org.uk - in other words, between their fellow pupils and staff. They cannot send email outside @cardiffsteiner.org.uk or receive email from outside @cardiffsteiner.org.uk. Parental consent will be sought before making this available to pupils below Class 10.
- Google+ *
- Calendar
- Chrome Sync
- Classroom
- Cloud Search
- Contacts *
- Docs, Sheets, Slides, Forms
- Drive
- Groups *
- Hangouts, Hangouts Chat*, Hangouts Meet, Google Talk
- Jamboard *
- Keep*
- Sites*
- Vault*

Google provides information about the information it collects, as well as how it uses and discloses the information it collects from G Suite for Education accounts in its G Suite for Education Privacy Notice. You can read that notice online at https://gsuite.google.com/terms/education_privacy.html

You should review this information in its entirety, but below are answers to some common questions:

What personal information does Google collect?

When creating a student account, Cardiff Steiner School may provide Google with certain personal information about the student, including, for example, a name, email address, and password.

The only personal information which we provide to Google to run this service are pupils' names. A pupil's login ID is derived from their first name and surname as in the following example:

Child's name: John Bold

Child's username: john.bold@cardiffsteiner.org.uk

No personal information whatsoever, such as dates of birth, gender, addresses is provided or linked to names.

Google may also collect personal information directly from students, such as telephone number for account recovery or a profile photo added to the G Suite for Education account.

When a student uses Google services, Google also collects information based on the use of those services. This includes:

- device information, such as the hardware model, operating system version, unique device identifiers, and mobile network information including phone number;
- log information, including details of how a user used Google services, device event information, and the user's Internet protocol (IP) address;
- location information, as determined by various technologies including IP address, GPS, and other sensors;
- unique application numbers, such as application version number; and
- cookies or similar technologies which are used to collect and store information about a browser or device, such as preferred language and other settings.

How does Google use this information?

In G Suite for Education Core Services, Google uses student personal information to provide, maintain, and protect the services. Google does not serve ads in the Core Services or use personal information collected in the Core Services for advertising purposes.

Does Google use student personal information for users in primary and secondary schools to target advertising?

No. For G Suite for Education users in primary and secondary schools, Google does not use any user personal information (or any information associated with an G Suite for Education Account) to target ads, whether in Core Services or in other Additional Services accessed while using an G Suite for Education account.

Can my child share information with others using the G Suite for Education account?

We may allow students to access Google services such as Google Docs and Sites, which include features where users can share information with others but not publicly.

Will Google disclose my child's personal information?

Google will not share personal information with companies, organisations and individuals outside of Google unless one of the following circumstances applies:

- With parental or guardian consent. Google will share personal information with companies, organizations or individuals outside of Google when it has parents' consent (for users below the age of consent), which may be obtained through G Suite for Education schools.
- With Cardiff Steiner School G Suite for Education accounts, because they are school-managed accounts, give administrators access to information stored in them.
- For external processing. Google may provide personal information to affiliates or other trusted businesses or persons to process it for Google, based on Google's instructions and in compliance with the G Suite for Education privacy notice and any other appropriate confidentiality and security measures.
- For legal reasons. Google will share personal information with companies, organisations or individuals outside of Google if it has a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - meet any applicable law, regulation, legal process or enforceable governmental request.
 - enforce applicable Terms of Service, including investigation of potential violations.
 - detect, prevent, or otherwise address fraud, security or technical issues.
 - protect against harm to the rights, property or safety of Google, Google users or the public as required or permitted by law.

Google also shares non-personal information -- such as trends about the use of its services -- publicly and with its partners.

What choices do I have as a parent or guardian?

You and your child can visit <https://myaccount.google.com> while signed in to the G Suite for Education account to view and manage the personal information and settings of the account.

Parents, carers or learners who have serious data protection concerns have a right to object to the provision of G Suite for Education and should contact the School explaining why the provision of G Suite for Education infringes on the learner's rights and freedoms. The School will weigh up whether providing access to G Suite for Education is outweighed by the gravity of the objection. Further information is available on the [ICO website](#)

You can request deletion of your child's G Suite for Education account, subject to the above, by contacting gadmin@cardiffsteiner.org.uk

If you wish to stop any further collection or use of your child's information, subject to the above, you can request that we use the service controls available to limit your child's access to features or services by contacting gadmin@cardiffsteiner.org.uk

What if I have more questions or would like to read further?

If you have questions about our use of Google's G Suite for Education accounts or the choices available to you, please contact gadmin@cardiffsteiner.org.uk If you want to learn more about how Google collects, uses, and discloses personal information to provide services to us, please review the [G Suite for Education Privacy Center](#) (at <https://www.google.com/edu/trust/>), the [G Suite for Education Privacy Notice](#) (at https://gsuite.google.com/terms/education_privacy.html), and the [Google Privacy Policy](#) (at <https://www.google.com/intl/en/policies/privacy/>).

The Core G Suite for Education services are provided to Cardiff Steiner School under [Google's Apps for Education agreement](#) (at https://www.google.com/apps/intl/en/terms/education_terms.html) and the [Data Processing Amendment](#) (at https://www.google.com/intl/en/work/apps/terms/dpa_terms.html).

- The [G Suite for Education Privacy Notice](#) describes how Google products and services collect and use information when used with G Suite for Education accounts.
- Information about the [legal commitments Google makes for G Suite for Education Core and Additional Services](#)
- Information about how Google's products work to protect privacy is available in [Product Privacy Guide](#) and at privacy.google.com. Note that Google does not use any user personal information (or any information associated with an G Suite for Education Account) to target ads for G Suite for Education users in primary and secondary schools, and any statements about ads on those pages are overridden by this restriction from the [Privacy Notice](#).

- Information about Google's compliance with international legal obligations on data protection can be seen in the [Data Processing Amendment to G Suite and/or Complementary Product Agreement](#), which describes extensive measures for data security that Google and its customers have agreed.
- Answers to many top questions about privacy and security appear on in the [Google for Education Privacy and Security Center](#).

Issue date

This notice takes effect from 26 March 2020

Review date

This policy will be reviewed and revised by the Data Protection Officer as required and in line with legal changes

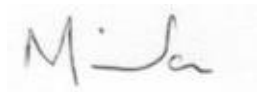
Endorsement

Full endorsement to this policy is given by:

Name: Miranda Knight

Position: School Administrative Manager /Designated Safeguarding Lead

Signed:



Date: 26 March 2020