

Privacy Notice – eMonitoring - Students

This privacy notice has been written to inform members of the public, parents, pupils and staff of Hartlepool Aspire Trust, about how and why we process their personal data in relation to eMonitoring.

Who are we?

Hartlepool Aspire Trust is a 'Data Controller' as defined by Article 4 (7) of the UK GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The trust has appointed Veritau Ltd to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the trust is compliant with the UK GDPR and to oversee data protection procedures. Veritau's contact details are:

Schools Data Protection Officer
Veritau Ltd
County Hall
Racecourse Lane
Northallerton
DL7 8AL
schoolsDPO@veritau.co.uk

01904 554025

Please ensure you include the name of your school in all correspondence



What eMonitoring software do we use?

The trust uses Impero eMonitoring software. A copy of Impero's Privacy Notice can be accessed via this link: [Impero Privacy Notice](#)

What information do we collect and why do we collect it?

By using Impero eMonitoring systems the trust collects, stores, and uses the following information to identify you and the information you have accessed:

- a. Username
- b. Computer
- c. Time
- d. Reason for the capture of information
- e. Attachments of relevant screenshots

The trust operates e-monitoring software for the following purposes:

- Safeguarding

Our lawful basis for processing your personal data is Article 6(1)(c) and 9 (2)(b) respectively:

6 (1) (c) Legal Obligation The system facilitates the e-monitoring of students IT usage which allows for the effective safeguarding of students. This supports students by ensuring their wellbeing in protecting them against harmful online content and alerting the school to any potential safeguarding risks as evidenced by the individual's internet usage. This is in line with the duty of care that the school are responsible for providing as set out in the Education Act 2002.

Department for Education's statutory guidance 'Keeping Children Safe in Education' obliges schools and colleges in England to "ensure appropriate filters and appropriate monitoring systems are in place. Children should not be able to access harmful or inappropriate material from the school or colleges IT system" however, schools will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding." Schools (and registered childcare providers) in England and Wales are required "to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering" (Revised Prevent Duty Guidance: for England and Wales, 2015).

9 (2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection.

Who has access to your personal data?

Your information will only be made available to trust employees where there is a need to investigate the report. Only employees authorised by trust management may have access to this information.

Who do we share your personal data with?

We will only share captured information with other agencies where there is a lawful reason to do so - for example to share with the police for the purposes of crime prevention.

How long do we keep your personal data for?

Information which does not meet the trust threshold will be retained for 90 days.

Information which meets the trust threshold will be retained until the student is 25 years old.

What rights do you have over your data?

Under the UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation,
- to request access to your personal data that we hold, and be provided with a copy of it,

- to request that your personal data is erased where there is no compelling reason for its continued processing.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow Cheshire
SK9 5AF
icocasework@ico.org.uk // 0303 123 1113