Privacy Notice – Digital Learning & Teaching

Introduction

The Council is committed to supporting the appropriate and effective use of digital technology within our education services to support and enhance learning, teaching, curricular and assessment activities.

The Council has undertaken an Empowered Learning Programme to further enhance digital learning and teaching by improving pupil access to technology. The Programme is designed to give all City of Edinburgh learners the opportunity to improve their educational outcomes, and to develop digital skills that will be vital for life, learning and work in an increasingly digitised world by providing equity of access. Further information on the Empowered Learning Programme can be found at: Empowered Learning

As part of digital learning and teaching, the Council needs to collect, store, use, share and dispose of personal data relating to pupils and other learners, teachers, carers and parents. This is known as data processing.

The basis on which the Council processes personal data to support its education services is outlined in our broader Education Privacy Notice at: Education Privacy Notice

This privacy notice provides further information around how we use personal data to support digital learning and teaching in our schools.

The digital tools

This notice only covers the standard suite of M365 applications, devices and tools offered to Council schools. Any bespoke resources used within individual schools will either use our main Education Privacy Notice alone or have their own privacy notices.

Within schools, all pupils, teachers and other education staff have access to **Microsoft for Education: Microsoft 365** which includes the following:

Outlook	Outlook provides account profile and access to email. A Global Address List of account holders within the tenancy provides an internal directory to support communication and collaboration. Student users

	have localised address books specific to their main establishment of attendance.
Calendar	Calendar allows students to learn time management skills and to schedule activities or appointments.
OneDrive	OneDrive provides the account holder with a document storage space for individual use. Sharing options are available for sharing and collaborating with others.
SharePoint	SharePoint provides storage space accessible by multiple users, as controlled by access permissions.
Teams	Teams provides a storage and collaboration space for a group of users. Class Teams provides Class Notebook, Assignments and other education focussed tools. Teams provides opportunities for classes and other focus groups, such as Pupil Council, Music Tuition Groups to collaborate.
Word	Word provides document creation. Accessibility features such as Immersive Reader, Dictate and Translate can be used.
Excel	Excel provides spreadsheet creation.
PowerPoint	PowerPoint provides presentation creation. Accessibility features such as Immersive Reader, Dictate, Translate.
Sway	Sway provides interactive presentation creation.
Planner	Planner allows students to develop organisational skills.
To Do	To Do allows students to plan, organise and track activities that support their learning and assessment.
Stream	Stream provides video media storage.
Visio	Visio provides tools to represent information in diagram form.
Minecraft Education	Minecraft Education provides a game-based learning experience built for the learning environment. It supports collaboration, coding, assessment in curricular and extra-curricular activities.
Whiteboard	Whiteboard is a digital whiteboard providing real time free form collaboration space between users.
Translator	Translator provides translation services supporting learners in multiple languages.
Seeing AI	Seeing AI provides narration of the environment around the user. The narration can be provided in multiple languages.

P1-P5 benefit from access to devices held within schools, and in addition P6-S6 have access to devices provided on a 1:1 user model. Apple devices (such as iPads) are managed using **Apple for Education: Apple School Manager** which includes:

Managed Apple ID	Managed Apple ID for Education provides access to a range of Apple for Education services.

iCloud	iCloud provides the account holder with a storage space for individual use.
Pages	Pages provides document creation. Accessibility features can be used to support learners.
Keynote	Keynote provides presentation creation. Accessibility features can be used to support learners.
Numbers	Number provides spreadsheet creation.
GarageBand	GarageBand provides musical resources supporting composition and expression.
Swift Playgrounds	Swift Playgrounds is an educational tool providing coding opportunities for learners.
iMovie	iMovie provides opportunities to create, store and manipulate multimedia.
Clips	Clips provides quick and easy access to multimedia for learners to record and annotate their learning activities.

In addition, we have access to and can opt to utilise **Glow**, which is Scotland's national digital learning platform provided by Scottish Government and managed by Education Scotland. Glow is Scotland's nationally available digital environment to support learning across the curriculum. Glow accounts provide access to a number of different web services on any device. Glow is a resource that can be used in addition to our core CEC M365 allowing access to the National eLearning Offer resources.

Additional applications, resources and tools may be used in some schools and by some pupils, dependent upon needs, suitability and availability. These include digital learning "apps" and games to encourage learning. Further information regarding specific resources can be requested by contacting the pupil's school/education setting in the first instance.

What personal data do we process via these tools?

Some personal information we hold about pupils and staff as part of our digital learning and teaching provision is obtained from existing sources, including student information records held within SEEMiS. The information collected includes:

- Main establishment of attendance
- Year group
- Scottish Candidate Number
- Forename
- Surname

In addition, the digital learning and teaching tools may collect additional information and content about learning, progress and attainment.

Users can utilise digital tools to generate, store and share their own content.

How do we use this personal data?

The Council needs to ensure fair and equal access to technology for all children and young people across the City of Edinburgh education estate as part of our digital learning and teaching provision. Every pupil should have access to a range of digital resources to both support their learning and assessment and to help them collaborate with other learners.

To achieve this, we use the personal data of pupils and staff in the following ways:
- to provide and manage these digital resources;
- to assess, monitor and keep a record of attainment, achievement and progress;
- to provide interactive teaching and learning spaces; and
- to encourage collaboration between different learners.

To provide good quality services and to meet our various legal obligations, we will also share this personal data between teams within the Council as a single data controller on a need only basis.

What is the legal basis for processing this personal data?

The City of Edinburgh Council is a local authority established under the Local Government etc. (Scotland) Act 1994. As part of its statutory functions and activities, it provides a wide of range of education in schools and other settings. Digital learning and teaching is provided as part of this education provision.

Processing personal information is necessary for the performance of a task carried out in the public interest of the Council. Consequently, Article 6(1)(e) of UK GDPR has been identified as a lawful basis as 'processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller'.

How this personal data is kept secure.

The Council takes privacy issues very seriously and is committed to ensuring that all users of the Empowered Learning Programme are aware of their responsibilities in this area. To ensure maximum awareness, learners and carers/ parents are asked to sign a Responsible User Agreement and a Home School Agreement. This sets out rules around information sharing and responsible account use. Further information can be found at: Empowered Learning downloads

Accounts and their login details are provided to pupils and are for the use of the intended recipient only. Pupils should not provide their login details to any other person. If a pupil is concerned that their login details may be compromised, they should speak with staff at their school/education setting, or during school closure periods contact can be made with the Council central contact office:
Contact us – The City of Edinburgh Council

If concerns regarding inclusion within digital resources are raised, parents/carers, other appropriate adults or those pupils aged 12 or over, should contact their school/education setting or alternatively the council Data Protection Officer (details noted below).

Do we share any personal data?

To provide good quality services and to meet our legal obligations, we will share this personal data with external partners and agencies involved in delivering services within our public task on our behalf.

The Council may also provide personal data to third parties, but only where it is necessary, either to comply with the law, or where permitted under data protection legislation. For further information, please see our Education Privacy Notice:
Education Privacy Notice

Where digital tools are provided by third parties, data shared with these third parties is minimised, and only shared for the purpose of providing tools and resources that support the learner's education and personal development.

For further information about how Microsoft tools use personal data, see:
- Microsoft Privacy Statement – Microsoft privacy
- Privacy for young people – Microsoft privacy

For further information about how Apple uses personal data, see:
Data_Privacy_Schools_2018_BWD_040618_en-GB.pages (apple.com)

For further information about how Glow uses personal data, see:
Glow Privacy Policy – Glow Connect

For further information about the National eLearning offer, see:
National e-Learning Offer | Education Scotland

How long is this personal data kept?

We will not keep this personal data of pupils and staff for any longer than it is needed and will dispose of it in a secure way. The length of time we need to keep information will depend on the purpose for which it is collected. The Council has a Record retention schedule which sets out how long we keep records and the reason why. Further information can be found at: Edinburgh Records

Those leaving the Council education provision have their accounts deleted by local administrators upon formal notification of the leaving date.

Data rights

Everyone has several rights under data protection law, including the right to request your information and to request that the information is amended or erased if incorrect.

We are relying on public task for this processing, this means pupils and staff have the following rights:

- to be informed about the collection and use of your personal data – this is called '**right to be informed**';
- to ask us for copies of your personal information we have about you – this is called '**right of access**', and is also known as a subject access request (SAR);
- to ask us to change any information you think is not accurate or complete – this is called '**right to rectification**';
- to ask us to stop using your information – this is called '**right to restriction of processing**';
- to **object to processing of your information**, in certain circumstances; and
- to **complain to the Information Commissioner** if you feel we have not used your information in the right way.

You may request that your personal data is removed or hidden from the applications and tools used to deliver education, which may include but not be limited to being hidden from the Global Address List. If you do object to this processing, it may impact our ability to deliver elements of digital learning, teaching and assessment.

Please note that there are legitimate reasons why we may refuse your information rights request, which depend on why we are processing it.

To discuss your rights in more detail please contact: Information.compliance@edinburgh.gov.uk

Data Protection Officer

The Council has a Data Protection Officer who you can contact in the first instance if you have any questions or complaints about how we are processing your personal information.

Data Protection Officer
City of Edinburgh Council
Waverley Court (2.1)
4 East Market Street
Edinburgh
EH8 8BG

Tel: 0131 469 6174
Email: dataprotectionofficer@edinburgh.gov.uk

If you are still unhappy with how the Council have handled your complaint, you can contact the UK Information Commissioner's Office – the regulator for data protection matters in the UK.

UK Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113
Website: www.ico.gov.uk