

# Classlist Parent App

## Data Protection Impact Assessment (DPIA) Input Guide

### 1. Name and Aim of Project / Technology / System

System name : Classlist

Company URL : <https://www.classlist.com/>

Aim : Classlist will provide an inclusive method for parents to connect and communicate with each other. Classlist will also provide substantial in-app functionality including event management and ticketing; PTA communication; volunteer rostering, and fundraising management including integrated raffles, and a parent marketplace.

Background: Historically WhatsApp and social media groups have been used to facilitate parent communication. However not all parents are on Whatsapp or all social platforms and in particular Whatsapp introduces numerous inclusivity, GDPR and safeguarding concerns. Indeed the UK Independent Schools Bursars' Association in March 2022 issued a Guidance Note on Parent WhatsApp Groups for their members expressing their concerns about the use of such groups, which also highlighted Classlist as a potential alternative platform. This Guidance Note was prepared with input from Farrer & Co and Classlist.

### 2. Structure of System and Responsibilities

- a) Classlist offers a cloud based Software as a Service app. Classlist will act as data processor. The School or school PTA will act as the data controller (the "controller") for the system.
- b) The School will assist with data upload and verification as parents join and leave, and at the end of each school year.
- c) Participants given full access rights to the system are called "Ambassadors". There are other roles, such as "Class Rep" and "Staff Admin", which have more limited rights and more limited data visibility.
- d) The individual with the highest level of access, taking full responsibility for the system, will be the [Chair of School PTA / relevant School representative].
- e) The School will have Administrator rights enabling the upload of data and sending of certain messages but will have limited access to parent generated content.
- f) Classlist's app will not be integrated with the school MIS and the system will not be granted any automated access to the School's information management

systems. The School will upload parent data into the Classlist app through a csv download.

- g) Parents do not have to register with Classlist if they choose not to. Parents will however receive email regular announcements from the PTA sent via the Classlist system unless they unsubscribe. A parent can unsubscribe from Classlist at any time.
- h) All parent data is shared with other parents on a consent basis. Parents can alter their sharing preferences at any time through a self-service interface.
- i) Classlist's processes and procedures were developed in 2017 by the legal firm Veale Wasborough Vizards (VWV) who provided an Opinion that the processes and procedures were compliant with GDPR.

### 3. Personal Data Used by Project/Technology/System

#### a) **Parents:**

- i) Full Name
- ii) Contact Details
- iii) Relationship to child
- iv) Address Details – but can choose to withhold
- v) Payment details – will be able to pay for events through Classlist via Stripe

#### b) **Students**

- i) Name
- ii) Gender
- iii) Class Information
- iv) Month of Birth
- v) Family contact details
- vi) House information - where applicable

Parent name and contact details will be entered directly by the school, or validated by the school, in order to control registration and manage who has access to the system.

### 4. Purpose of Processing

The purpose of the app is to improve communication between parents, and permit the PTA, school and other representatives to communicate easily with all parents and manage other aspects of the parent community in a simple and modern way.

Functionality includes an announcement tool from the PTA and school, and an event management tool. It will be possible to sign up and pay for the events through the app.

The system generally restricts parent visibility to those within particular year groups. There is the ability to search for any parent and view all parents who have consented to display their home location on a map to facilitate meeting up and lift shares.

In addition there is a marketplace for the sale and exchange of items between parents. Parents can also send private messages to each other, and set up interest groups for parents to opt in to.

## 5. Steps taken to protect data

### Steps taken by Classlist

- Classlist shall ensure that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.
- Classlist shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:
  - i. the pseudonymisation and encryption of personal data.
  - ii. the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.
  - iii. the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
  - iv. a process for regularly testing, assessing, and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
- Classlist shall, having regard to the state of technological development and the cost of implementing any measures, take appropriate technical and organisational measures against the unauthorised or unlawful processing of personal data and against the accidental loss or destruction of, or damage to, personal data to ensure a level of security appropriate to the harm that might result from such unauthorised or unlawful processing or accidental loss, destruction or damage; and the nature of the personal data to be protected. Classlist shall take reasonable steps to ensure compliance with those measures
- Classlist must notify the Customer of any personal data breach affecting the personal data without undue delay, and, in any case, not later than 72 hours after Classlist becomes aware of the breach.
- Classlist shall ensure that parents have direct access to the information held on record and can update their data directly on Classlist where required.

### Data retention

- Data will ordinarily be retained for three years after the parent's child leaves the school but may be subject to shorter retention periods for example if a parent requests for their account to be deleted
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## Third Parties

- Personal data will not be sold to third parties, nor will it be shared with third parties so they can serve advertisements
- Third parties cannot collect personal data from the Classlist platform
- Below is a table access by different categories of Classlist User.

**Table 1: Access by different categories of Classlist user**

<b>Parties able to access parent data</b>	<b>Scope and purpose of access</b>
1 General Public	No access to any parent personal data.
2 Classlist Advertisers	No access to any parent personal data. Information may be provided on an anonymised basis.
3 Parents at each Classlist school	Another parent cannot see any information about you unless and until your registration has been approved (except for parents who are Class Reps or Ambassadors, please see below). Once your registration has been approved parents can see information about you as detailed in Table 2 below. Your data is not shared with parents at other schools.
4 Class Representative	Similar access to parents. In order to authenticate joiners they can also see data about who is applying to join their class and who is awaiting approval.
5 Classlist Ambassador	Each Classlist school site is set up and managed by one or more Classlist Ambassador, generally a parent but occasionally a member of the school staff. Classlist Ambassadors can see the personal data supplied by all parents at the school with certain safeguarding exceptions detailed below. They can also see email details for parents who have been invited to join Classlist by Ambassadors or Class Reps. This latter excludes invitations sent directly from individual parents within the Classlist system, which are not visible. Please note that if you are a parent and you invite other parents to join then you must do so only where the other parent has previously consented to joining Classlist.
6 School Administrator	School administrators have the same level of data access as Classlist Ambassadors. They may also validate and update data (for example, which class a pupil is in) using school records. They also inform the Classlist Safeguarding Officer if exclusion orders or other special circumstances require that specific parents may not access Classlist. These interchanges are not visible to other users including Classlist Ambassadors. Users registering with Classlist will have their details checked against personal data held by the school or on occasion the PTA for purposes of user verification and authentication.
7 Classlist Staff	Classlist staff have access to all parent personal data which has been supplied by parents or directly by the school or the PTA.

	However, in practice Classlist Staff will only access such data in limited circumstances for specific reasons (for example if your school asked Classlist to investigate abusive comments posted by another parent). They may not have access to data provided by school authorities to Classlist's Safeguarding Officer (please see below). Please note that if the controller is your school or the PTA (please see the introduction above) then any safeguarding issues must be reported direct to them.
8 Classlist Safeguarding Officer	Classlist's Safeguarding Officer is employed by Classlist to assist schools and other members with safeguarding concerns. This officer has access to all parent personal data and any additional data provided in relation to safeguarding issues.

Note : When Class Reps and Ambassadors are assigned these roles, their attention is specifically drawn to the sections highlighting their special responsibilities in handling personal data set out in section 4 of the Terms & Conditions.

## Steps taken by the school

- An email will go out from the School Head announcing the introduction of Classlist by [the PTA / the School]. A link will then be sent out by email by Classlist to all parents inviting them to register and download the app. Typical take-up at this point is around 85-90%. If parents choose not to register, announcements from the school or PTA about will continue to go out to every parent until they unsubscribe.
- At the invitation stage the school will either upload the relevant parent data (email; first parent name, last parent name; year of child; class of child) into the Classlist system or work with the PTA to ensure all details are checked and that only authorised parents/guardians of child who attend the school are invited to register and subsequently approved.
- The school will also ensure that the relevant staff members have access to this technology and the appropriate training is provided to those members of the school staff involved with the system.

## Steps taken by the PTA / Friends' Association

- Those parents acting as Ambassadors or Class Reps have additional access to parent data and the T&Cs they sign highlight that this comes with additional responsibilities.
- The PTA and school staff involved need to review who has these additional access rights on a regular basis.
- The PTA and school staff involved also need to ensure they take sufficient precautions when accessing the Classlist system including generating robust passwords and not leaving their access devices unattended.

- They also need to ensure that parents and parent data is deleted at an appropriate point as set out above once parents have left the school.

## 6 Impacts and Risks

School Assessment of Risk		
	Risk Level	Comments
Likelihood of harm to data subject	Unlikely/Possible/Likely	<b>Unlikely</b> as data subjects can choose what data is shared. It is not compulsory for parents to register. For International data transfers to 3 <sup>rd</sup> countries without an adequacy decision these are covered by SCC arrangements set out in Classlist's sub-processor list which can be found here <a href="https://dataprotection.classlist.com/resources">https://dataprotection.classlist.com/resources</a>
Severity of harm (regardless of likelihood)	Minimal/Significant/Severe	<b>Minimal</b> as everything is done on a consent basis.
Overall risk (taking into account measures to reduce risk above)	Low/Medium/High	<b>Low.</b> Classlist is used by many schools and, as highlighted by ISBA, is a more compliant, more secure and more robust option than parents using WhatsApp.
DPO Assessment of Risk		
Likelihood of harm to data subject	Unlikely/Possible/Likely	
Severity of harm (regardless of likelihood)	Minimal/Significant/Severe	
Overall risk (taking into account measures to reduce risk above)	Low/Medium/High	

## 7. Other relevant information

- The School will have Administrator rights enabling the upload of parent data through a csv download, but will have limited access to parent content.
- Classlist's app will not be integrated with the school MIS and the system will be not be granted any automated access to the School's information management systems.

Commented [SH1]: Added 06/11/2023

- c) Parents do not have to register with Classlist if they choose not to. Parents will however receive email regular announcements sent via the Classlist system unless they unsubscribe. A parent can unsubscribe from Classlist at any time.
- d) All parent data is shared with other parents on a consent basis. Parents can alter their sharing preferences at any time through a self-service interface.
- e) Classlist's processes and procedures were developed in 2017 with advice from Veale Wasborough Vizards (VWV) and have been updated subsequently with input from specialist data protection lawyers Clayden Law.

**Compliance Statement**

I can confirm that this data protection impact assessment has been completed to the best of my knowledge and that the technology complies with the data protection principles under the GDPR.

All privacy risks and solutions have been considered and represent a proportionate response to the identified risks to personal data

Signed:



Date: 16/11/2023

**DPO Statement**

I confirm that I have reviewed the DPIA above and have made recommendations set out in the comments above which should be accounted for before implementing

**Review**

This data protection impact assessment should be reviewed to ensure control measures are working and updated to reflect significant findings or changes.

<b>Date of next review:</b>	September 2024
<b>Review to be carried out by:</b>	PTFA Classlist Administrator

Prepared : 06/11/2023