

## **St Peter at Gowts Church of England Primary School**

### **Tapestry Policy 2018**

This policy is intended to be shared with any person who uses Tapestry as part of their “right to be informed” under UK data protection law.

Under the EU Data Protection Legislation we must tell you, as part of your right to be informed, what data we are storing, why we are storing it and who we are sharing it with.

### **Contact Details**

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### **Lawful Basis for the use of Tapestry**

The Lawful basis for storing of children’s information is Public Task as the school is deemed to be a public authority and the storing of data is for an official function- to track and assess children’s learning and progress.

The lawful basis of Consent is used when processing parent and staff emails, contact details and personal information.

### **What Data do we as a school store for Tapestry?**

As a school we use Tapestry as a method for tracking children’s learning and progress and for assessment purposes in Nursery and Reception. On Tapestry we store children’s photos, information relating to their assessments, date of birth, postcode, information such as SEN, EAL, UPN number, gender, and cohort year. We also collect and store parents’ names and email addresses in order that parents can view their child’s Tapestry profile and can contribute to it.

We delete all profiles and associated data from Tapestry at the end of the year the child leaves Reception or the beginning of the following year.

### **Why do we store data via Tapestry?**

We store data via Tapestry in order to provide information about each child’s learning, assessments and progress towards the Early Learning Goals and the Characteristics of Learning as part of their progress through the Early Years Foundation Stage.

### **Who do we share the data with?**

We share Tapestry information to communicate information with staff, parents (of their own child) and the Local Authority for data collection purposes. Data is downloaded for parents and some is printed for parents without internet access and as a record of learning to be stored in children’s files.

If a child moves to another setting which uses Tapestry, we will transfer the data to the setting.

## **Tapestry Company Information and Policy**

### **About Tapestry the Company**

We are the Foundation Stage Forum Ltd, a company registered in England with company number 05757213 and a registered address of 1, Southdown Avenue, 1184 Lewes BN7 1EL, UK. Our customers are childminders, educators, nurseries, schools or similar educational organisations.

### **About You**

You are someone who has been given access to Tapestry by one of our customers. For example, you could be a member of staff, a relative of a child, the child themselves, or someone acting on behalf of a child. You may have rights under EU Data Protection legislation relating to information we store about you. These rights are described here: [https://ico.org.uk/for-the-1192 public/](https://ico.org.uk/for-the-1192-public/). If you want to exercise those rights, please contact the customer who is storing data in Tapestry in the first instance (e.g., the school or nursery). If they want help in carrying out your request, they can contact us. Our lead supervisory authority for data protection is the UK Information Commissioner's Office (<https://ico.org.uk>).

### **The Service**

Our customers pay us to provide them with a service that allows them to create online learning journals for children under their care, monitor those children's progress and share this information with their staff and, if they wish, those children's parents and relatives.

### **What data do we collect?**

Our customers may choose to store some of the following data on our service:

- The names and email addresses of their staff

### **What data do we collect?**

- The names, dates of birth and postcode of their children
- The names and email addresses of the parents and relatives of their children
- The contents of a learning journal: assessments of children's performance, notes, photographs and videos of the children
- A record of the child's care:
  - what they ate and drank
  - toileting
  - how they slept
  - whether they had any accidents

Our customers store this information in order to record, analyse and, if they wish, share the progress of their children. Our customers have the freedom to choose what data they store and who they store it about. Our customers choose who has access to the data. Our customers are able to correct and delete data at will. Our customers must tell you, as part of your right to be informed, what data they are storing, why they are storing it and who they are sharing it with. In providing the service, we will send automated emails to staff and parents in order to confirm email addresses, reset

passwords and notify them of events relating to the customer (such as when a new observation is added about a child). We never send any marketing information, though we do send staff a newsletter about Tapestry. We ONLY access the data stored by our customers in order to carry out our customer's instructions, to maintain or improve the service or to fix faults. We do not use our customer's data for marketing. We use sub-contractors to process some of the data, but we do not otherwise share this data with other organisations. If your contact details are registered on Tapestry in the 'contact details' section, or as a 'manager' then we may contact you if we have a question or concern about the associated Tapestry account.

**When you visit the Tapestry web site we collect your:**

- IP address, together with
- Information your computer sends about its web browser and operating system, and
- What pages you look at (e.g., the list of observations), but not the content of those pages (i.e., we could not tell directly from the data whether the list of observations contained information about a particular child, though given time and access to the data above it would be possible to figure that out).

**What is the lawful basis for storing this data?**

We use this information to monitor the security of our service, to help us figure out how to improve the service (e.g., what browsers should we support? How much capacity should we add?) and to improve the way we market the service (e.g., what search terms were used to discover our site). We do not share it.

If you use our phone or tablet application we collect:

- The IP address of the network your phone or tablet is on, together with
- The make and model of your phone or tablet, together with
- The version of your phone or tablet's operating system, together with
- Details of any crashes that occur in the application, and
- What screens you look at in the application (e.g., the list of observations), but not the content of those screens (i.e., we could not tell directly from the data whether the list of observations contained information about a particular child, though given time and access to the data above it would be possible to figure that out).

We use this information to monitor the security of our service and to help us figure out how to improve the service (e.g., what causes crashes? which crashes need fixing most urgently?). We do not share it.

**What is the lawful basis for storing this data?**

Our customers decide and must tell you the lawful basis for the data they add to Tapestry. Please note, your consent is not the only lawful basis for storing data and our customers may have a different legal basis.

**Whose data is it?**

We don't claim ownership of the data entered into Tapestry. We only use it according to our customer's instructions to provide the service described above. Formally, in UK data protection legislation terms, our customers are the "Data Controller" and we are the "Data Processor". There are three exceptions to this, where we are the "Data Controller":

1. The content of our billing system
2. The content of our support ticket system
3. The content of our forums

#### **Who do we share data with?**

We do not share data, except as explicitly requested by our customers.

#### **How do we collect the data?**

If they wished, our customers might give other people (e.g., staff or parents) access to data. They might download or print some or all of the data and share it with other people (e.g., staff, parents, the government). They might transfer some of the data to another organisation (e.g., parents, the government, another educational establishment looking after a child). We ONLY access the data stored by our customers in order to carry out our customer's instructions, to maintain or improve the service, or to fix faults.

#### **How do we collect the data?**

Most data is entered by our customers directly into our website or through our phone and tablet applications. Our customers may, if they wish, permit parents and relatives of children to add data to the service. Some data (described above) is sent automatically by your web browser or by our applications. We may store cookies on your computer in order to verify that you are logged in and to store your preferences. The cookies themselves do not contain any identifiable information about you or about what you look at.

#### **Can I see my data that is stored on your system?**

Yes. The school, childminder, nursery or similar educational organisation, can give you a copy of data about you that they or you have stored in Tapestry. We can provide you with a copy of any of the other data that has been collected (e.g., our records of your IP address and / or make and model of your tablets etc.).

#### **Can I have my data corrected or deleted?**

Yes. The school, childminder, nursery or similar educational organisation, can correct or delete the data they or you have stored in Tapestry. The process of deletion is gradual: initially deleted data is moved to a 'deleted' area in case it was deleted in error. After a delay, it is then permanently deleted from our main systems. After a further delay, it is then permanently deleted from our backups.

#### **What are our customer's responsibilities?**

Our customers decide who to add data about, what data to add, and how long to keep it for. They have overall responsibility for complying with Data Protection law (or the equivalent in other countries). We describe this in more detail in the contract we have with our customers. But, for instance, they have to:

- Ensure they have a legal basis for what data they store on Tapestry and who they share it with.
- Think about what information it is appropriate to share with whom, given their situation and that of the children under their care.
- Respond to requests for access to data.
- Train their staff about sensible security and confidentiality precautions:
  - Taking care of passwords.
  - Taking care not to install software on computers that may compromise security.
  - Taking care not to access material from inappropriate places where it can't be kept appropriately confidential.
- Delete data when it is no longer required.
- Remove access for people who no longer need access.
- Give parents instructions in accordance with their safeguarding policy.

### **Contacting Us**

You can contact us at [customer.service@eyfs.info](mailto:customer.service@eyfs.info) or 1, Southdown Avenue, Lewes BN7 1EL, UK

We also have a Data Protection Officer, Lauren Foley, who can be reached at [dpo@eyfs.info](mailto:dpo@eyfs.info).1332