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Data Security and Encryption Policy

East Learning CIC ("East Learning") has taken and will continue to take every step necessary to ensure that the information it collects and processes is done so in compliance with all applicable laws and regulations, and is stored securely.

Data storage and encryption

East Learning stores all the data it collects through the Aspire web platform in an Amazon Web Services ("AWS") Relational Database Service resource, based in London. This automatically provides daily backups and controls to restore data, and allows for easy tracking and monitoring of any database backups made.

Data is encrypted within the database, using 'bcrypt' to hash passwords and AES is used to encrypt plain text data. v4 UUIDs are used in place of sequential primary keys.

The HTTPS protocol is used to transmit data between Aspire's the front-end website and backend. From there, separate HTTPS data transfers take place between the client and server API components.

Data access

Direct database access for East Learning's team members is both password protected and restricted to specific IP addresses, and is given on a need-to-know basis.

Access through the platform to Personal Data is restricted through strict role-based access controls, ensuring only the school staff members who have been explicitly granted permission by their school's Aspirations Programme Lead will be able to see the Personal Data for a particular group of students ("Tutor Access")

Certain pieces of data, including Sensitive Personal Data relating to safeguarding and mental wellbeing, are subject to additional controls, with each staff member needing to be explicitly granted permission to see this data for any pupil for whom they have Tutor Access. This permission will be granted by the school's Pastoral Manager as designated by the Headteacher, typically the Designated Safeguarding Lead.

No school is able to access data collected from other schools.

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Duration of storage and destruction of data

East Learning CIC shall retain pupil data for up to 5 years after their last involvement with the platform, or until they ask for their Personal Data to be deleted, whichever is sooner. Requests for Personal Data to be deleted will be responded to in accordance with all applicable laws, taking into account both the new Right to Erasure obligation (under GDPR) and statutory guidance on child safeguarding.

After the 5 year period, or when a Data Subject has asked for their data to be deleted, East Learning shall ensure that all Personal Data relating to the Data Subject is permanently erased from all of its records. In the case of redundant data, this will be done through the use of an automated process which will run through all records on a termly basis and identify any records which have not been updated for the maximum time of 5 years for deletion.

Any paper copies of any Personal Data created or held by EL will be shredded (in accordance with BS EN 15713 (or other later standard)) after use

Registration

East Learning CIC is registered with the Information Commissioner's Office, with certificate number ZA 545780.

Responsible Officer

East Learning CIC's named Data Protection Officer is Angharad Thomas. If you have any queries regarding the information set out in this policies, or about our Data Protection processes more generally, she may be contacted on angharad.thomas@eastlearning.co.uk

Signed

Matthew Lees
Director
East Learning

29 August 2019