

Data Protection Impact Assessment: CODE Maths Hub

Assessment completed 27th September 2022 by Susannah Renwick-Johnston (CODE Maths Hub Project Manager)

Reason for completing DPIA

CODE Maths Hub is led through Truro and Penwith Academy Trust on behalf of Truro and Penwith College. They hold a grant with the Department for Education (DfE) to deliver the Maths Hub programme in Cornwall and the Isles of Scilly, and parts of West Devon. As part of this work, some personal data is collected, processed, and stored.

The nature of the processing involved

The Hub works with other organisations and at times makes data available to other organisations. This includes contracted partners, such as the National Centre for Excellence in the Teaching of Mathematics (NCETM) or the DfE, who collaborate on the national Maths Hubs programme.

Where personal data is shared with other organisations, the data sharing complies with data protection legislation. For the purpose of the national Maths Hubs programme:

- The DfE is the overall Data Controller.
- The NCETM (with whom the DfE holds a contract to coordinate and manage the Maths Hubs programme) is a data processor (The NCETM employ the services of Tribal Group to manage their systems).
- The DfE holds individual grants with each Maths Hub Lead School to carry out activities aligned with the aims of the Maths Hubs programme. These schools are data processors. In the case of CODE Maths Hub the Lead School is Truro and Penwith College/ Truro and Penwith Academy Trust.

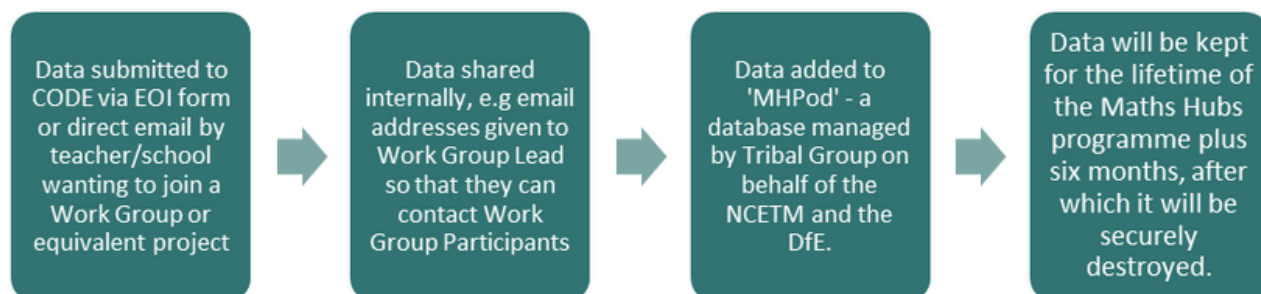
Data collected by CODE Maths Hub that is relevant to the successful coordination and delivery of the Maths Hubs programme nationally will be shared with the DfE, the NCETM and other Maths Hub lead schools. Such data may also be shared with an independent evaluator of the Maths Hubs programme and Teaching for Mastery programme.

Some data is also shared with members of staff at organisations or schools other than the Lead School, or independent consultants, if they are completing paid work for the Hub (e.g. Work Group Leads). Data protection requirements are included in their Service Level Agreements for Hub work.

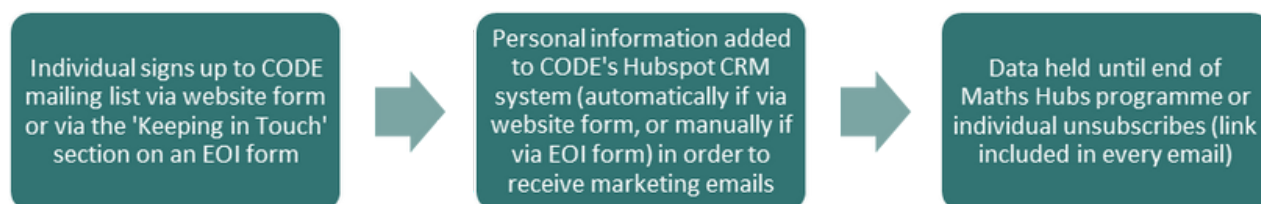
If Lead School status is transferred, data will be shared with the new lead school.

Data may also be shared with organisations or consortiums that hold a future contract with the DfE to coordinate and manage the Maths Hubs programme or with an independent body who will use the data to evaluate the work of the programme.

Use of personal data for individuals involved in Work Groups or equivalent projects with the Hub



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 The Hub also utilise a mailing list as a marketing tool. Personal information used for this purpose is held on a Hubspot CRM system. There is an opportunity to unsubscribe on all emails sent via Hubspot. Individuals are given the option to opt-in to these emails on EOI forms, and via the CODE website.



The scope of the processing

CODE Maths Hub collect, process, hold, and share data from the following categories:

- Names
- Contact information (most commonly email addresses, but occasionally phone numbers, where deemed necessary)
- School name and unique reference number (URN)
- Teacher Reference Number (TRN)

The Hub does not collect any special category data.

Data is only collected from individuals/schools involved or intending to be involved in the Maths Hubs programme.

The data will be kept for the lifetime of the Maths Hubs programme plus six months, after which time it will be securely destroyed. Under Data Protection legislation, and in compliance with the relevant data processing conditions, personal data can be kept for longer periods of time when processed purely for archiving purposes in the public interest, scientific or historical research, and statistical purposes.

Context of processing

Data is stored about individuals/schools who have been involved in or intend to be involved in the Maths Hubs programme. CODE does not collect data relating to children or vulnerable groups.

The systems and technology used are kept up-to-date and evaluated periodically.

Purposes of processing

Personal data is collected by CODE Maths Hub for the following purposes:

- To enable the Hub to correspond with participants about any Maths Hub project that they have registered for
- To enable the Hub to send information on Continued Professional Development (CPD) opportunities offered by Maths Hubs
- To evaluate and assess performance of Maths Hub projects
- To derive anonymised statistics which inform programme funding and strategic decisions about Maths Hubs and Teaching for Mastery within DfE, NCETM and the Maths Hub lead school.

Necessity and proportionality

For the purpose of the Maths Hubs and Teaching for Mastery programmes, processing is necessary for the performance of a task carried out in the public interest, as defined in Article 6 (1)(e) of the GDPR. It is consistent year-on-year and has proved to be necessary and useful in achieving the aims of the project.

This assessment document will be shared with key members of the team to ensure that data protection requirements are understood and applied consistently across the Hub.

Personal data will not be transferred outside of United Kingdom or the European Union.

Risk assessment

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk
Internal error causing unsafe data processing practices	All individuals completing paid work with the Hub sent information about the importance of data protection and keeping personal data safe.	Reduced	Low
Inadequate data storage systems reducing the safety of data	Storage systems used by the Hub evaluated regularly and kept up to date. Information about reporting data breaches shared with all relevant staff.	Reduced	Low
Data shared with individuals completing paid work for the Hub who work outside of the Lead School may not store data safely	Data protection expectations included in Service Level Agreements. Where possible, data shared via secure cloud-based file systems (e.g. Google Drive).	Reduced	Low