

## Q&As

**Q1-** Regarding the legislative articles that will continue to be updated up until June 2026, we were asked if we will let you know when documents are updated:

**A- Yes, everything** that is in the Resource Hub now has been reviewed and updated during the summer break (2025).

For any additional changes required, yes, we'll keep you informed and as soon as the changes are reviewed and our resources are updated to meet the changes, you will be notified by email - the updated resources will be highlighted for you in the Resource Hub.

**Q2- Do schools need to update their policy and privacy notices now, or wait until further changes have come through?**

**A-** Yes, if you have it on your list to update policies now or you're in a position to review them this Autumn term, then yes, you are advised to update now from what is in the Resource Hub – these include updates to URLs.

**Q3-** While talking about Online Service and 'information society service' we were asked for examples of what these were:

**A-** Jo highlighted examples such as your Microsoft or Goggle Workspace Education Tenancy, if you are using these with pupil accounts.

Under UK GDPR and the Data Usage and Access Act (DUAA), an Information Society Service is defined as:

*“Any service normally provided for remuneration, at a distance, by electronic means, and at the individual request of a recipient of services.”*

This includes most online services, even if they are free to use, as long as they involve processing personal data and are delivered electronically.

Additional examples include but are not limited to:

- Educational platforms: e.g. Mathletics, Times Tables Rock Stars, Purple Mash
- Online games and coding apps: e.g. Scratch, Tynker
- Streaming services: e.g. YouTube Kids, BBC Bitesize
- School-home communication tools: e.g. ClassDojo, Seesaw
- Touch typing and phonics apps: e.g. Nessy, TypingClub

These services are covered by the Age-Appropriate Design Code (AADC) and must meet stricter standards when used by children.

**Q4-** While talking about assessing the services that you are using in schools we were asked if these requirements apply to existing providers, and what if schools are not certain, that they have assurances from an existing provider:

**A-** Data Protection Impact Assessments (DPIA) should be completed whenever you are looking to move or adopt new services.

Your Information Asset Register (IAR) should be where you're logging for existing providers, so if you don't have this already, yes, this is something you should go back to review. This will make up your annual audit.

**Q5-** Regarding the new requirements for the Complaints Form. We were asked:

- Is this a first port of call for requesters, to share if they wish to make a complaint about data handling or if schools should try to resolve issues first?
- If the electronic complaints form should be provided on the school website?

**A-** The form is something that should be shared as you bring SARs and data breach issues to a close. To date, email templates have included the text for requesters to contact the ICO if they have a complaint with how the school have handled the data/request.

Now, the ICO expect that schools collate the complaints rather than people going direct to the ICO.