



Dear parents and guardians, dear students,

Since March 2020 school life has fundamentally changed. We are happy that we were able to work with the 'Classroom' Learning Management System (LMS), which turned out to be a reliable learning platform right at the beginning of the lockdown. This enabled the school's timely response to the school closure, with continuous online and later also hybrid forms of instruction.

The LMS 'Classroom' is part of Google's '**Workspace for Education**', which has been successfully used by the entire NMS teaching staff for the past seven years. Its use has been secure and collaborative, in accordance with our school's privacy policy. Workspace is used by public schools and universities worldwide. In Italy, Austria and Switzerland, Workspace Education is among the preferred national learning platforms. After careful consideration, Classroom - as an integrated part of Workspace - has proven to be the most suitable learning platform for our international state school. Therefore, when the school closed in March, we were prepared to immediately start using this virtual online classroom for distance lessons with our students. We would like to thank you for your support during this intensive period.

The vast majority of the NMS community has expressed the wish to continue to learn and teach with 'Classroom' as a learning platform for contemporary education. Therefore, in August 2020, NMS made the platform available for both students and teachers. In close cooperation with the district's privacy officer we have made the **following upgrades and improvements**;

- We **purchased school licences** for the professional version of 'Workspace **Enterprise** for Education'.
- The data is hosted exclusively and guaranteed on **servers in the EU**.
- All students have been provided with **pseudonymised school accounts** (paid for by the school).
- As before, only school data will be processed, and no private or sensitive data will be processed.
- Formal (certified) as well as informal training on online learning for NMS staff has been ongoing.

The IT-team provides user accounts for new students. These accounts are pseudonymised and do not contain the student's name. In line with the GDPR, this is one of the measures taken to prevent any profiling. The student username will consist of a number and the domain we have acquired for this purpose: xxxxxx@nms-berlin.de. The subsequent lists with student names and accounts are only shared with the class teachers. Students are asked to reset the password provided by the school with their own personal password. If a profile name needs to be changed, the student can send a request to it@nelson-mandela-schule.net Profile names contain the first name only and a group abbreviation, in order to facilitate communication between students and (subject) teachers and with classmates.

All we need from you is your consent. Please fill out the consent form on page 6 and return it to the class teacher/ tutor at your earliest convenience.

Please also read parts A and B belonging to this letter, in the online version (on the **NMS website** and in the **BUZZ Newsletter**): part A covers the processing of student data (data protection information according to Art. 12 DS-GVO) and part B provides information on the use of the platform. Part C is the consent form; **in the printed version this can be found on the back of this letter**, and in the online version the consent form is the last page (6). For the sake of the environment, we decided to refrain from printing all six pages (x 1300 students!). You will receive the English version in print via the class teacher, the German version can be found online. Full details can be found in the special Workspace Buzz, and on the NMS website, via the QR code on the right.





A) Information regarding data protection according to Art. 12 DS-GVO

Information about the processing of data by G-Suite's learning management system.

Who is responsible for the processing of personal data?

Responsible is the school: Nelson Mandela School Berlin

Primary school campus: Pfalzburger Straße 23, 10719 Berlin, Germany, Phone +49 (0) 30 8639537-0

Secondary School Campus: Pfalzburger Straße 30, 10717 Berlin, Germany, Phone +49 (0) 30 8639538-0

(Interim) School Principal: Dr. H. Bauer

Email: 04K04@04K04.schule.berlin.de

Who can I contact if I have questions about data protection?

Questions regarding data protection can be directed to the school's IT team at it@nelson-mandela-schule.net or to the district's data protection officer: Datenschutzbeauftragte, Senatsverwaltung für Bildung, Jugend und Familie, Außenstelle Charlottenburg-Wilmersdorf, Waldschulallee 29-31, 14055 Berlin, Phone: +49 151 162 50 223

For what purpose may my data be processed?

The processing is necessary for the use of the professional version of the core apps of Workspace Education, including 'Classroom', a communication and learning platform with which tasks can be placed online and accessed and processed from home. Teachers may conduct online lessons with the entire learning group or provide individual support and advice in small groups between students and teacher. The core apps include Meet for videoconferences, Drive for online storage, Sheets to create spreadsheets, Docs for online Text processing, Forms for surveys and Sites as website builder.

On what legal basis is the data processing carried out?

The processing is carried out on the basis of your consent. No student account will be provided without this consent.

What personal data is processed when using Workspace Education?

Data is processed to create a user account (pseudonymised school email-address, password, school affiliation, membership of class or year group, roles (student) and rights), to display user status and read receipts (chat), created chat messages, video and audio data from video conferences, content from screen sharing, files shared by upload, calendar entries created, status of tasks (assigned, submitted, due, feedback), content created and edited in the apps as shown above, technical usage data to provide the functionality and security of Workspace Education. The school does not store the video and audio data of video conferences. When using Workspace Education via the private devices of students and parents, the IP address, provider, web browser and operating system used, requested files, and date and time of access can be transmitted via the web portal. Profiling may therefore be possible, yet the email address is pseudonymised and not linked to a private email address. At the school, all devices have the same IP address, which makes it impossible to be personally profiled.



Who has access to my personal data?

The Google Apps Terms of Service contractually state that NMS (or the students, faculty or staff) are the sole owners of the data shared on Workspace Education. All files, content and comments posted to Workspace Education by users are accessible only to the same domain-users with whom they are shared. These can be individuals or members of a group. Teachers have access to edits made and content created within tasks. All participants in a videoconference have access to videoconference content, chats, shared files and screen sharing in the sense of seeing, hearing and reading. In a chat, all participants have access to shared educational content and shared files. Google only has access to the data it collects during the use of the educational chat as far as this is necessary to fulfil its obligations under the contract for order processing concluded with the school.

To whom is the data transmitted?

The use of Classroom and other Workspace Education core services by NMS teachers and students is subject to a contract for data processing. Under the terms of the agreement, the personal information collected in the core services is used only for the provision of core services such as Gmail, Drive, Docs, Meet, Sheets and Slides. There is no advertising in the Core Services. Customer data from the core services will not be used for advertising purposes. Google does not use personal data or any other data associated with Google accounts from G Suite for Education users to educational institutions. **Therefore, no transfer will take place, in accordance with the GDPR.**

How long is my information stored?

The storage of data processed to provide the user account ends as soon as the user has left the school, or revokes his or her consent in whole or in part, or objects to processing. The data will be deleted within 2 months after the students have left the school. Deletion from Google's systems is completed after 30 days from the time an account or content is deleted by the school. The same period also applies to the deletion of files by the user himself. Audio and video data from video conferences on Meet are not recorded and stored by the school. Content in files shared by others, edited and submitted tasks and messages in group chats are stored as long as an online classroom exists. Classrooms for class and study groups are generally archived each year and completely deleted no later than 2 months after the end of the school period of the students concerned, including any content and chats created, shared and edited by students.

Additional Information

Where is my personal data processed?

The processing of personal data in the core services of Workspace Education like Classroom, Meet and Drive, takes place on servers within the EU.

How secure is Workspace Education?

The platform meets all current security standards for cloud platforms. Read more in the report from the [German Federal Office for Information Security](#).

Where can I find out more about the Workspace Education privacy policy?

<https://policies.google.com/privacy?hl=en>. The following section is of particular importance with regard to personal data of people at school.



What does NMS do to protect my personal information when I use Classroom, Meet or another core app in Workspace Education?

As a school, protecting the personal information of our students and teachers is a top priority. Therefore, we take technical and organisational measures to ensure that the use of Workspace Education is as secure as possible. We have set up Workspace in such a way that there are as few risks as possible due to the actions and errors of the users themselves. The training of the users for a safe and responsible use of the tools in Workspace is of central importance. A basic training will take place before access is granted. This is supplemented by an annual instruction and the Usage Regulations (see Part B). The **NMS data protection guidelines** apply accordingly.

B. Rules of Use

1. rules of conduct

1.1 All users agree to respect the rights of other persons.

1.2 Each student receives a **personal student account**. The student account must be secured by a **password** of at least eight characters (upper/lower case letters, numbers, special characters) which cannot be guessed easily. It is prohibited to share the password with other users.

In case of loss or suspicion of misuse, the administrator must be informed and a new password must be created. **It is not permitted to work under another account.**

1.3 The user chooses his own username, which is normally the first name or a nickname, but which is recognizable to the teachers. A short addition in order for the teachers to recognise students with the same name in the same year group may be added. Entering further data in the profile, especially photos and the birthday, is not permitted. It is recommended that as little personal information about oneself as possible be disclosed.

1.4 All users are obliged to respect the **filters and blocks** used and to not circumvent them.

No contractual relationships may be entered into in the name of the school or other persons or in one's own name when using Internet content.

2. evaluation of and access to data

In case of suspicion of unauthorised use of the communication platform, in particular in case of suspicion of criminal offences or administrative offences, the school management can take the following measures to the extent necessary:

- Evaluation of system protocol files
- Evaluation of the protocol data generated in connection with Internet use
- Inspection of contents of e-mail and chat communication.

The school management decides in each individual case which protocol and usage data are evaluated to clarify the process.



3. Communication

3.1 E-mail

If the school provides users with a personal e-mail account, this can and may only be used for communication within the school (internal use). The school is therefore not a provider of telecommunication in the sense of § 3 No. 6 of the German Telecommunications Act. A legal claim of the user to the protection of communication data in the network therefore does not exist against the school.

Spamming, chain letters or similar are not permitted. The school's e-mail address may not and cannot be used for private purposes to register for Internet offers of any kind. This applies in particular to social networks such as Facebook or Instagram, but also to services that are not part of the Workspace Core Apps.

3.2 Chat/Messenger

If the school provides an educational chat or messenger function, the same requirements apply as for e-mail use.

3.3 Forum

If the school provides an educational forum function, the same requirements apply as for e-mail use. Furthermore, the moderators of the forums are entitled to delete inappropriate posts.

3.4 Content

Users agree to respect the rights of others in forums, chats, messages and e-mails sent from G-Suite. Calendar entries for groups are not manipulated and are entered correctly.

3.5 Homework

Homework can be posted in Classroom and will be generally announced during in-classroom lessons if possible and always in the Classroom Stream. In times of school closure, homework will be announced in the Classroom Stream, whenever possible. Teachers will liaise and ensure that there is a reasonable amount of time for all homework to be completed.

4. Infringements

In the event of violations of the terms of use, the account can be blocked, allowing only limited use is possible. Suspected violations can result in measures under school regulations, civil or criminal law.

5. Contact

If you have any questions or comments, please send your personal feedback either to principal@nelson-mandela-schule.net or to it@nelson-mandela-schule.net.

We can only achieve an optimal use of Workspace Education together!



C. Consent to create a student account for Workspace Education Enterprise

Please return this page only to the class teacher or tutor until August 16th.

Name, first name and class of the student

-----Class -----

Please tick your answer!

I/we agree to the creation of a Workspace Education student account as described above.

Yes No

I/we agree to participate in video conferences via Meet (integrated in Workspace Education):

Yes No

NB: Naturally students may choose to switch off the video during a videoconference and participate only via audio.

The consent is voluntary. No disadvantages arise from not giving or withdrawing consent. In the event of non-consent, the course content will be made available in an alternative way. This consent can be revoked at any time in the future. In case of (partial) revocation, you/your child will no longer be able to use Workspace Education, or only to a limited extent. The revocation of the consent does not affect the legality of the processing carried out on the basis of the consent until the revocation. As far as the consent is not revoked, it is valid until the end of the school time at the school.

The implementation of Workspace Enterprise at the NMS has been carefully prepared with the district's data protection officer and all relevant stakeholders of the school. If you have any questions, please contact us. You have a right to ask the school for information about your personal data, furthermore you have a right of correction, deletion or restriction of the data collected and a right to object to the processing and a right of data transferability. You also have a right to complain to the data protection supervisory authority, the Berliner Beauftragte für Datenschutz und Informationsfreiheit. We thank you for your continued support and speedy reply.

We have taken note of the information on the user regulations and the information on data processing.

Place, date

Signature of guardian

Place, date

Additionally: signature of student only when 16 +