



## Debate Mate Schools and Debate Mate Limited GDPR Data Classification Policy

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This classification grid covers all data or information held, in print or in electronic format, by Debate Mate including documents, spreadsheets and other paper and electronic data and should be applied by all Debate Mate personnel including, contractors, consultants and third parties whom have access to Debate mate and systems.

It is the responsibility of staff working with contractors consultants and third parties to ensure this policy is brought to their attention and that they assess and classify the information they are working with and apply appropriate controls.

Data classification is based on the level of sensitivity and the impact on Debate Mate should that data be disclosed, altered, lost or destroyed without authorisation. The classification of all data into different categories ensures that individuals who have a legitimate reason to access a piece of information are able to do so, whilst at the same time ensuring that data is protected from those who have no right to access the information. The classification will guide the appropriate security and technical controls required to be in place.

All data owned, used, created or maintained within Debate Mate should be categorised into one of the following four categories:

- **Public** - non-sensitive information, the unauthorised disclosure, modification or loss of which would cause no damage to Debate Mate
- **Internal** - information not intended for a public audience, but the unauthorised disclosure, modification or loss of which would have a minimal impact on the interests of Debate Mate
- **Restricted** - private information, the unauthorised disclosure, modification or loss of which would be detrimental to the interests of Debate Mate
- **Confidential** - Sensitive information, the unauthorised disclosure, modification or loss of which would cause significant harm to the interests of Debate Mate

The majority of information held by Debate Mate will come under the Public and Internal categories. A smaller amount of information will be categorised as Restricted or Confidential. The Confidential classification should only be used in exceptional circumstances.



Activity	Public	Internal	Restricted	Confidential
Marking	PUBLIC or no mark	INTERNAL – documents should be marked 'internal' Emails should be marked 'internal'	RESTRICTED – documents should be marked 'restricted' Emails should be marked 'restricted'	CONFIDENTIAL – documents should be marked 'confidential' Emails should be marked 'confidential'
Description	Non-sensitive information which may be viewed by all members of the public	May be seen by all members of the staff but would not normally be available to people outside of the organisation	Accessible by restricted members of staff on a need to know basis. Often containing sensitive/special categories of personal data	Accessible only to designated or relevant members of staff due to its potential impact on the organisation (including financial or reputational damage)
Level of risk if released	None	Low	Medium	High
Access controls	No access restrictions. Information is widely available and can be accessed by the public	Can be shared within the organisation.	Access is restricted to a small group of staff who need the information to carry out their roles.	Access is strictly limited to authorised personnel only.
Storage of data and security	Can be stored on any device and placed on the internet. There are no restrictions on printing and copying this data, subject to copyright restrictions.	Should be stored on the company Dropbox. Care should be taken if information is transferred to any non-Information Services managed external and mobile devices. Paper records should not be left lying around.	Information should be held within the company Dropbox with restricted access and appropriate security. Information should not generally be transferred to external or mobile devices but if absolutely essential then encryption must be used. Paper records should not be left unattended.	Information should be held only in restricted areas of the company Dropbox and protected with secure credentials. Paper copies should be limited and, when not being referred to, held in locked storage.



Distribution/ transmission of data	No restrictions	Information may be placed in shared folders and sent via internal email or externally in sealed envelopes.	Should only be placed in folders with restricted access. Care should be taken when emailing and acceptable encryption used if appropriate. Items sent by internal mail should be placed in sealed envelopes.	Should only be transmitted electronically in an acceptably encrypted format. Distribution via email must be authorised by line management. Hard copies of documents should be hand delivered internally. External postage should be signed for.
Disposal	No restrictions. Recycle where possible.	Most paper documents can be placed in paper recycling. Delete electronic media when no longer required	Shred or use confidential waste bags for paper documents, ensure electronic media is wiped clean	Shred paper documents and permanently destroy electronic media
Examples of data	School lists and competition leader boards, photographs of programmes and individuals that have been approved to be public.	Database of schools, clients, parents and partners.	Mentor DBS certificates, child protection reports.	Mentor details, employee information, job applicants information.



All data across Debate Mate will be stored on either Google Drive, Dropbox, Gmail, Salesforce and Carecheck. Google Drive, Dropbox, Gmail, and Salesforce all use two-factor authentication methods of security.

Data	Classification	Data Requirements
<p>Mentor Details</p> <p><b>Salesforce:</b> Mentor Emails, Mobile, Home Address, University Name, University Address, Date of Birth, Bank of Account Details.</p> <p><b>Google Form:</b> Diversity and Equalities Monitoring - contains information such as Gender, Race, Religion, Disabilities, Ethnicity. Other forms contain personal information e.g. name, email, mobile.</p>	Internal	<p>All mentor information on Salesforce is protected via two factor authentication. Outside of office staff, only a select few mentors have access to this information for limited time periods in order to complete tasks. We require mentor email addresses and mobile numbers so that Debate Mate staff members can directly contact mentors about their role, to provide information and to offer additional volunteer opportunities. Addresses are visible by Debate Mate staff members so that we can place mentors at schools close to their homes and universities.</p> <p>All Google Forms containing personal mentor data are kept securely on Google Drive which requires two factor authentication and is only accessible by Debate Mate staff. Information on mentor gender, race, religion, disabilities, and ethnicity is used to assess the percentages of each group to ensure Debate Mate is an equitable organisation.</p>
<p>Mentor Details (DMS)</p> <p><b>Google Form:</b> Sexual Orientation</p>	Confidential	<p>This is optional for mentors to share with us. Information on sexual orientation is kept in a protected folder in Google Drive and is only accessible by select members of the Senior Leadership Team. This information shall be deleted as soon as we have recorded the percentages of individuals in each group in order to ensure we are building an equitable organisation.</p>



Mentor Details  <b>Google Form:</b> <i>Personal Document Details (passport, driving ID etc.), previous 5 addresses</i>	Internal/External	This information is collected for the purpose of Enhanced Disclosures and Barring checking which is part of our safeguarding policy. It is collected by Debate Mate in Google Forms and stored on Google Drive accessible only by Debate Mate staff.
Mentor DBS Certificates	Restricted	Mentor information is processed securely using an external provider, who have their own privacy policy and are GDPR compliant. Currently we use CareCheck. All DBS certificates including any disclosures are accessed through the secure CareCheck website and can only be viewed by Debate Mate staff.
School Information  <b>Salesforce and Google Forms:</b> Teacher and Senior Leadership Team Emails and Mobiles	Internal	School information is kept securely on Google Drive and Salesforce. Teacher and SLT email addresses are used to contact and update them on the running of the programme, events and important information.
School Information  Salesforce and Google Forms (Teacher Emails, School Names)	Public	Names of schools on our programme will be included on our Website's leader boards following our Urban Debate League and Debate Mate Cup competitions. Information about school achievements may also be used on our social media pages with the permission of the school.



Student information  Monitoring and Evaluation Data, including students' first name and initial of their surname, Year Group, Free School Meal status, EAL status, SEN status, End of Year Student Surveys (Name, School, Year Group)	Internal	In week 5 and 15 of the programme we complete detailed monitoring and evaluation of students' in their first and final debates of the programme to report their progress to funders. We do not collect students' surnames. We do ask teachers for their FSM / EAL and SEN status. This data is stored on Google Drive and is only accessible by Debate Mate staff members. The data collected is anonymised before being included collectively in our annual reports.
Staff  <b>Charlie HR:</b> Staff Emails, Numbers, Address, Date of Birth, Bank of Account Details  <b>Google Form:</b> Gender, Sexual Orientation, Race, Religion, Disabilities, Ethnicity.	Confidential/Internal	Personal information contained on Charlie HR (personal emails, numbers, Addresses, Bank Account Details) will only be accessible by the finance department. This will allow Debate Mate to pay and email payslips to staff members. Time booked off by staff members will be visible on CharlieHR so that the rest of the team is aware.  Staff are invited to complete our Equality, Diversity and Inclusion information form. This is stored on Google Drive and is only accessible by members of the Senior Leadership Team. Information on staff gender, sexual orientation, race, religion, disabilities, and ethnicity is used to assess the percentages of each group to ensure Debate Mate is an equitable organisation. Data on sexual orientation will be deleted from the Google Forms within 6 months of being collected.



Grad School  Names, Mobile, Emails, FSM information	Internal	<p>The office staff member in charge of Graduate School will be in contact with students using their mobile and email. This information is stored securely on Google Drive.</p> <p>Students will be provided with a link in which they can join a central Graduate School WhatsApp group, if they wish, which will be monitored by a designated Debate Mate member of staff.</p>
Job applications (DMS/DML/DMO)  CVs, cover letters, contact details	Confidential	<p>CVs and cover letters will be used to review candidates for open positions. Potential candidates apply for positions by emailing their CVs and covering letter (including personal details, education information and previous employment), to a member of the Debate Mate SLT. This data will be uploaded into a restricted folder on Google drive which only Debate Mate SLT and the team involved in the recruitment/ interview process will have access to.</p> <p>Data of this kind will be stored on Google Drive for up to 2 years before being deleted.</p>



<p>Client Information</p> <ul style="list-style-type: none"><li>-Contact details (name, email, mobile / telephone numbers) for L&amp;D teams</li><li>-Participant registers which includes email addresses</li><li>-Notes on participants from training and 1-1 sessions</li><li>-Evaluation data for clients (anonymised)</li></ul>	<p>Internal</p>	<p>Contact details of Learning and Development teams are used for us to maintain relationships with external organisations. Contact details will be stored in our CRM system Streak which is password protected and only used by the team managing these relationships.</p> <p>We collect the email addresses of individuals who attend our in-person events with the intention of updating and contacting participants and organisers about training sessions and provide links and training information. When we email these contacts for the first time, we give them the option to opt out of receiving any further correspondence from us. Furthermore, notes on participants in training and 1-1 sessions are kept with the intention of delivering feedback to the specific individual. This information will be stored on the Debate Mate Limited Dropbox which is only accessible to Debate Mate Limited (DML) staff members that organise or facilitate training events. This information will be stored for the duration of the training contract.</p> <p>Data obtained from evaluations after training and events is anonymised before being delivered in a client review to measure the success of the training. This general data will be stored indefinitely to promote the efficacy of our corporate training.</p>
<p>Client/School/Student information</p> <ul style="list-style-type: none"><li>-Volunteer information for Boardroom to Classroom</li><li>-Bios for Show Debate sessions</li></ul>	<p>Internal / External</p>	<p>Work emails and in some cases mobile numbers are collected for volunteers to enable Debate Mate staff to liaise with them before they volunteer with us and share information on the event. Information is kept in the password protected Dropbox folder and is deleted when the contract is over or in our annual reset in August each year.</p> <p>Bios on individuals participating in our show debates/Classroom to Boardroom events will be collected by Debate Mate facilitators and the lead contact from the client side ahead of the events with the intention of <i>sharing the information more widely depending on who the event is aimed at (with the express permission of the person)</i>. Bios of clients/external staff who regularly participate in</p>





		our show debates/Classroom to Boardroom events will be stored in a secure file in Dropbox if consent is given by the individual. For one off volunteers the information will be deleted after the event.
Client/Freelancer/Teacher/ Student information <ul style="list-style-type: none"><li>- Passport information</li><li>- Next of kin and medical information for trips both UK and international</li></ul>	Internal	Passport/Next of kin/medical information will be collected when booking flights for individuals on our international trips. The data will be kept in a secure folder on Dropbox which only trip organisers will have access to. For one off trips the information will be deleted after the completion of the trip. Provided we are given permission, for associates of Debate Mate who go on more frequent trips, passport details shall be stored for longer in the secure folder on Dropbox.
Student information <ul style="list-style-type: none"><li>- WhatsApp numbers</li></ul>	Internal	Students, 16 and older, involved in Debate Mate events and training may be contacted by Debate Mate staff over WhatsApp and text. This shall be done on work phones provided by Debate Mate which are password protected.
Freelancers information <ul style="list-style-type: none"><li>- Contact details/phone numbers/invoice bank details</li></ul>	Internal	Contact details and phone numbers on casual/freelancer staff will be used to make orders on specific projects. Invoice bank details will be used to reimburse staff after projects have been completed. This information will be stored in a folder on Dropbox, accessible only by Debate Mate SLT or team members involved in ordering from suppliers, and will be deleted every 12 months.
Parent Contact information <ul style="list-style-type: none"><li>- names, numbers, addresses, bank details</li></ul>	Internal	The names, numbers, addresses and bank details of parents/guardians using our Debate Mate Online package allow us to contact parents/guardians when students are absent/if there are problems with clubs, to send reminders of upcoming sessions, deliver sales emails/newsletters, and provide invoices/receipts. Information is held on Google Drive.



DMO student information (names, dates of birth, additional learning needs, address, school details, personal information from reports created by mentors, recordings of student sessions)		<p>Names of students will be used to identify them on the class registers as well as to report on their performance. Dates of birth will be used to place students into club groups with their own age group. Addresses will be used for safeguarding purposes in the case of an emergency which needs to be reported. School details will also be stored for the sake of safeguarding as per our Child Protection and Safeguarding Policy. Report information from mentors will be used to track students' progress on the programme. Such data will be stored in a secure file in Google Drive accessible only by Debate Mate SLT or team members involved.</p> <p>Student sessions will be used for safeguarding purposes to identify any concerns reported by students/parents/mentors. These recordings will be stored for 30 days and will only be accessible only by the SLT on DMO.</p>
Staff Passport Details	Internal	We are required to check Right to Work in the UK when employment commences. SLT will ask to see each new employee's passport and store a scanned copy in a password protected folder in the Dropbox for the duration of their employment with us. We also collect ID documents from staff when completing DBS checks - this is done via a secure third party company
Child Protection and Safeguarding Concerns (includes child's name, school, and details of concern)	Restricted	All Safeguarding Concerns are raised confidentiality using a secure email and Google Form. This is only accessible by Debate Mate's Designated Safeguarding Leads and will only be shared with Safeguarding Leads at the child's school.
Photography: Storing and use on social media	Public	We seek the permission of all students and their parents / guardians before taking their photograph. Students and their parents / guardians are required to complete a Media Consent Form at the beginning of each academic year, which gives their permission for the use of the image (by Debate Mate and its partners). All images are stored securely on Dropbox and only accessible by a small number of staff, who are involved with marketing and social media.

