

SIMS Parent Privacy Notice Guidance

Document Dated	25 May 2018
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Purpose of document

Capita Education Software Services are fully committed to keeping customers and users' information safe.

This privacy notice is to help you understand what information SIMS Parent, a Capita Education Software Services product, processes, and the purpose for which it is collected and who the information is shared with.

Set out below this notice will provide you with the following information:

- Accountability
- What information does SIMS Parent Process?
- Why are you collecting this information?
- What is the legal basis for processing the information?
- Can a Parent request data to not be displayed within SIMS Parent?
- Where the data is stored?
- Security of the data stored
- Where the data is processed
- What information from sign in providers does Capita receive and store?
- Is the information received from Third party providers used outside of the sign-in process?
- What information do sign-in providers receive from Capita?
- Is there any additional Third Party processing of SIMS data?
- Cookies Policy:
- Right to lodge a complaint
- Contacting us

For the purposes of this Privacy Notice below is a glossary of terms used:

- "Information" means either the data held within SIMS Primary application or the School and contact contractual and support information, this will be specified where referred to.
- "ESS" means Capita Education Software Services.
- "Customer" means the establishment that purchases the service. i.e. individual school, Multi Academy Trust
- "Data Controller" refers to the Customer
- "Data Processor" refers to ESS
- "Data Subject" refers to a living person details that are recorded in the SIMS application by the Data Controller
- "Individual" refers to a person or employee who is associated with a named Customer
- "EEA" is the European Economic Area

Accountability

ESS provides you, the customer, with the SIMS Parent service; a secure, convenient way to engage with parents.

Where you are responsible for the information that is entered and maintained within the SIMS Parent service, this makes you, the customer, the Data Controller. ESS delivers the service that provides you with the ability to store this information and as such does not enter your information into this system for you, this makes ESS the Data Processor. As a Data Processor, ESS provide a hosted service that includes the application and customer data as well as support services to the customer.

As the Data Controller you are responsible for the information in the SIMS Parent system and must be able to demonstrate compliance with the 8 Principles of the Data Protection Act for the processing of personal information.

ESS must demonstrate the same compliancy for any processing of your SIMS Primary Data and School and school contact information.

Details of the 8 Principles are detailed on the Information Commissioner Office's website: <https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principle/>

Should you have any queries relating to the collection of your information or about this policy please contact the Capita Data Privacy Officer at privacy@capita.co.uk

What information is transferred?

SIMS Parent is a data processor of individual's information. SIMS Parent provides automatic integration and synchronisation with the school's designated SIMS System for the purpose of populating the SIMS Parent portal with the required individual's information (e.g. pupil/parent).

Selected information is transferred to SIMS Parent periodically via client services over a secure channel. The client services (school-side) uses client credentials to uniquely identify the school and authorise at the server.

This information contextualises the application's functionality (e.g. forename, surname, and student / parent relationships) and enables the successful account setup for the associated parent or employee by allowing schools to generate activation references for the correct individual's (e.g. parent/ employee) so that they are able to access the service.

The following data is required to allow the school to invite Parents/Guardians to use SIMS Parent and to display relevant data to parents about their children. Configurable items will only be stored if they are available to use and have been enabled by the school administrator. The data processed and the configurable items will be based on the scope of service – whether a SIMS Parent or SIMS Parent Lite customer.

Item	Data Fields	Configurable	Data Processed in Parent	Data Processed in Parent Lite
Student data	Forename, Surname, Date of Birth, School Photo	No	Yes	Yes
Contacts (Parental Responsibility)	Title, Forename, Surname, Email Addresses, and Addresses	No	Yes	Yes
School Details	Address, Head Teacher, Email Address, Web Site, Phone number	No	Yes	Yes
Homework	Title, Description, Subject, Start Date, Due Date	No	Yes	No
School Diary	Description, Category, Start Time, End Time	Yes	Yes	No
Session Attendance	Marks, Comments, Minutes Late, Session Dates	Yes	Yes	No
Lesson Attendance	Marks, Comments, Minutes Late, Lesson Dates and Times	Yes	Yes	No
Achievements	Type, Activity Type, Points awarded, Comments	Yes	Yes	No
Behaviour	Type, Activity Type, Location, Role, Points, Comments	Yes	Yes	No
Assessment	Result Date, Result, Result Rank, Result Value, Grade Set Value, Grade Set Description, Grade Set Rank, Grade Set Title, Marksheet Name, Marksheet Group Name, Marksheet Group Membership, Aspect Name, Result Set Name	Yes	Yes	No
Student Data (Data Collection)	Forename, Surname, Date of Birth, Gender, Address, Telephone Numbers, Email Addresses, Medical Practices, Medical Conditions, Disabilities, Cultural Information, Nationality, Passports, Method of Travel, Parental Consent	Yes	Yes	Yes
Contacts (Data Collection)	Title, Forename, Surname, Middle Name, Gender, Relationship, Parental Responsibility, Priority, Telephone Numbers, Email Addresses, Addresses	Yes	Yes	Yes
Reports	SIMS Filename, Filename, Title, Category, File Type, Content Type, Created Date, Permission Role, Permission Availability Dates, Role Types	Yes	Yes	No

Why is this information processed?

Designed with input from both schools and parents, SIMS Parent is intuitive and informative, providing parents with information on their child's progress to help inform, celebrate and support their child.

The above data is extracted for the purpose of displaying the information to the parent to support the partnership between child, parent and school by sharing this information from their school life. The school are able to customise what data is shared and displayed within SIMS Parent via the SIMS Parent Administration Portal.

What is the legal basis for extracting and processing this information?

The contract entered into by the School and Capita allows Capita to process the data in the above table for the purposes of displaying this information to the Parent.

Schools are able to easily define what data from the above table is displayed to the user within the SIMS Parent Administration Portal. If the School choose to withdraw information within the SIMS Parent Administration Portal so that it is no longer available via the product to the parent, that specific data category is removed from SIMS Parent services with the data residing within the School's SIMS database.

Can a Parent request data to not be displayed within SIMS Parent?

Yes, this is managed by the school. The parent is able to contact the school by phone or email via the SIMS Parent product to request removal of access. The School will need to decide if they wish to remove the data from within SIMS as there could be legal implications of doing so based on Statutory Returns.

Where the data is stored?

Data is stored within SIMS Parent in various forms, all using Microsoft Azure data constructs. Information interchange between software services within the applications is protected by a dedicated Secure Token Server (STS), so that access to all data is validated against the access rights of the requesting user.

Data sits with the EEA and is subject to EU model clauses, specifically data for these services reside in the EU: Ireland and the Netherlands.

Security of the data stored

SIMS Parent is a securely hosted web service, delivered via the web using standard HTTPS TCP/IP protocols. The SIMS Parent application is hosted on a secure and highly scalable managed service, with the main system hosting provided by Microsoft Azure® UK, which is reliable and resilient. Microsoft Windows Azure has G-Cloud Impact Level 2 (IL2) from the Cabinet Office for use across the UK Public Sector. All data is securely stored and processed within the EU and complies with UK data protection standards and requirements.

Technical hosting and management for SIMS Parent is undertaken fully by Capita on behalf of the establishment, including the provision of all software, maintenance operations, upgrades and background supporting processes. Application security is 256bit Secure Socket Layer (SSL), point-to-point encryption.

Where the data is processed

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How long do we keep your personal information

All personal data will be held in accordance with Capita plc group policy, and historical records will not be held without legitimate reason. We have a variety of automated retention policies in place that ensure data is regularly cleared down within SIMS Parent if it has not been used, updated or interacted with in a reasonable amount of time.

Essentially, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this privacy notice or until your request it is deleted.

Where the customer has explicitly configured certain SMS Parent data item sets, as outlined in the above table, SIMS Parent will retain this information. If a school no longer wishes to display data to parents this information is deleted 24 hours later.

If a customer is no longer in contract, or where individuals are no longer associated with a named Customer (e.g. pupil leaves the school) this information is deleted after 30 days.

What our legal basis is for processing your personal information

We will only collect and use your personal information (as described in section 4) in accordance with data protection legislation. Our legal basis for processing your personal information are as follows:

- 1. Contractual** – We may process personal data associated to a contract or product purchase. It is important for us to hold this data in order to ensure that we have records from a legal perspective to whom signed and agreed to the terms of agreements and who to contact following issues and/or to send renewal information.
- 2. Consent** – Where necessary we will only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing emails and process any sensitive information about you if we have your consent.
- 3. Legitimate Interests** – We may use and process some of your personal information where we have conducted Legitimate Interest Assessment and have a legitimate business grounds for doing so. Under European privacy legislation here is a concept of “legitimate interests” as a justification for processing your personal information.

You have a right to object to our use of your personal information for these legitimate interests. Please see **section 10 - Your rights** and how to contact us for how to do this.

Accessing SIMS Parent Service

What information from sign in providers does Capita receive and store?

When an individual logs into the service using a third-party login via SIMS ID they are prompted with a consent screen where they consent for their e-mail address and name to be passed to SIMS ID.

The e-mail address and name are passed to SIMS ID but no extended properties are received other than a unique identifier. The third-party identity provider has no concept of the education establishments that the user is associated with however, SIMS ID understands the site context, as does Parent App.

In the SIMS ID Database we store the e-mail address, a unique identifier which may or may not be the same as their mail address or may be GUIDS (Global Unique Identity that cannot be moved between services), the third-party provider detail may include the individual provided name, this is not stored – SIMS ID stores a name associated with the parent from Parent App (sims people service)

Is the information received from Third party providers used outside of the sign-in process?

This information is used to associate the third-party account with the SIMS ID identity that is used to authenticate the user to Parent App. The name from Parent App is displayed to help in identifying correct sign in by the end user.

We do not store the email address provided by the third-party login provider, we do however store the email address provided from parent app during the initial invite process for audit purposes.

What information do sign-in providers receive from Capita?

No data is passed from Capita to the sign in provider. We do not send credential information to the third-party provider. The information those service providers have already is freely given and agreed to at the point the user creates an account with the third party and accept the T&Cs of the provider.

Is there any additional Third Party processing of SIMS data?



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Push notification Communication:

SIMS Parent sends reminder notifications using the Apple Push Notification service and the Google Cloud Messaging service. These notifications contain summary information about Student events.

Email Communications:

SIMS Parent uses SendGrid, Privacy Shield Certified, to distribute invitation emails to individuals. To find out more please review our privacy notice guidance on SendGrid.

Microsoft Azure Applications Insights

SIMS Agora uses Microsoft Applications Insights to monitor the live web service. The software is used to manage and improve service performance and usability.

Cookies Policy

SIMS Parent uses a small number of cookies to provide the features in the web site and to help us improve its performance.

If you do not know what cookies are, or how to control or delete them, then we recommend you visit <http://www.aboutcookies.org> for detailed guidance.

The list below describe the cookies we use on this site and what we use them for:

Cookie Name	Purpose
ai_authUser	This helps us to proactively analyse the performance of the site and its infrastructure
ai_session	This helps us to proactively analyse the performance of the site and its infrastructure
ai_user	This helps us to proactively analyse the performance of the site and its infrastructure
angular-consent.global	Used to track if cookies have been accepted

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 25/05/2017

Right to lodge a complaint

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. They can be contacted via:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545 700

Contacting us

If you any questions or comments regarding the content of this Privacy Notice, please contact:

dssdataprivacy@capita.co.uk

Or alternatively write to us at:

The Data Protection Officer
Capita plc
71 Victoria Street
London
SW1H 0XA