

# **SIMS Parent App For Organisations**

Version: 1.0

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## Document introduction and scope

Education Software Solutions (ESS) is fully committed to keeping your information safe.

This document will provide you with privacy information relating to SIMS Parent itself but does not provide information about associated services that may require ESS to process customer personal data. For example, this document does not refer to the use of customer personal data for support or consultancy.

For products hosted on premises, ESS is principally a software provider. As a software provider (and even as a data processor for the provision of other services) ESS cannot provide information required by Article 13 or Article 14 of the GDPR (known as a privacy notice); this must be provided by the data controller.

We do recognise however that where our customers are data controllers, they are required to provide privacy notices to their data subjects and are also required in certain circumstances, to complete data protection impact assessments. For this reason, ESS has produced this Privacy Notice *Guidance* document for SIMS Parent, providing you with the following information:

**Please note:** Within SIMS, specifically, it is important to note that there are various products available. This includes the core suite but separately the satellite products which pull data from within a customer's core SIMS database. These satellite products each have their own privacy notice guidance document and we recommend you read each guidance document for all products provided to you by us.

## Accountability

ESS provides you, the customer, with the SIMS Parent that enables you to store the information for your school(s), and its associated contacts, required for communicating and sharing information/documents with parents of pupils of your school.

The entire SIMS Parent service is cloud hosted; i.e. the application and data processing is performed within the Azure cloud environment. No data is stored in an "on-prem" physical location.

Our customers are the Data Controllers for the information they add into the software provided by ESS. In this respect, ESS is purely a software and hosted service provider.

As your organisation is responsible for the information that is entered and maintained in SIMS Parent, this makes you, the customer, or the organisation receiving ESS product licenses, the Data Controller. ESS delivers the Cloud managed service that provides you with the ability to store this information and as such does not enter your information into this system for you. ESS is the Data Processor in this respect.

As the Data Controllers, ESS customers are responsible for the information in SIMS Parent and must be able to demonstrate compliance with data protection for the processing of personal information.

*The Information Commissioner's Office website can be referenced for full details on responsibilities of data controllers and processors: <https://ico.org.uk>*

## Who is storing / processing information about my organisation?

Education Software Solutions

Eastwood House

Glebe Road

Chelmsford

CM1 1QW

Website: <https://www.educationsoftwaresolutions.co.uk/>

## Product overview

SIMS Parent is a Parental Engagement product that enables Schools and it's staff to communicate and share relevant pupil and school information directly with parents. Including reports, timetables and notifications.

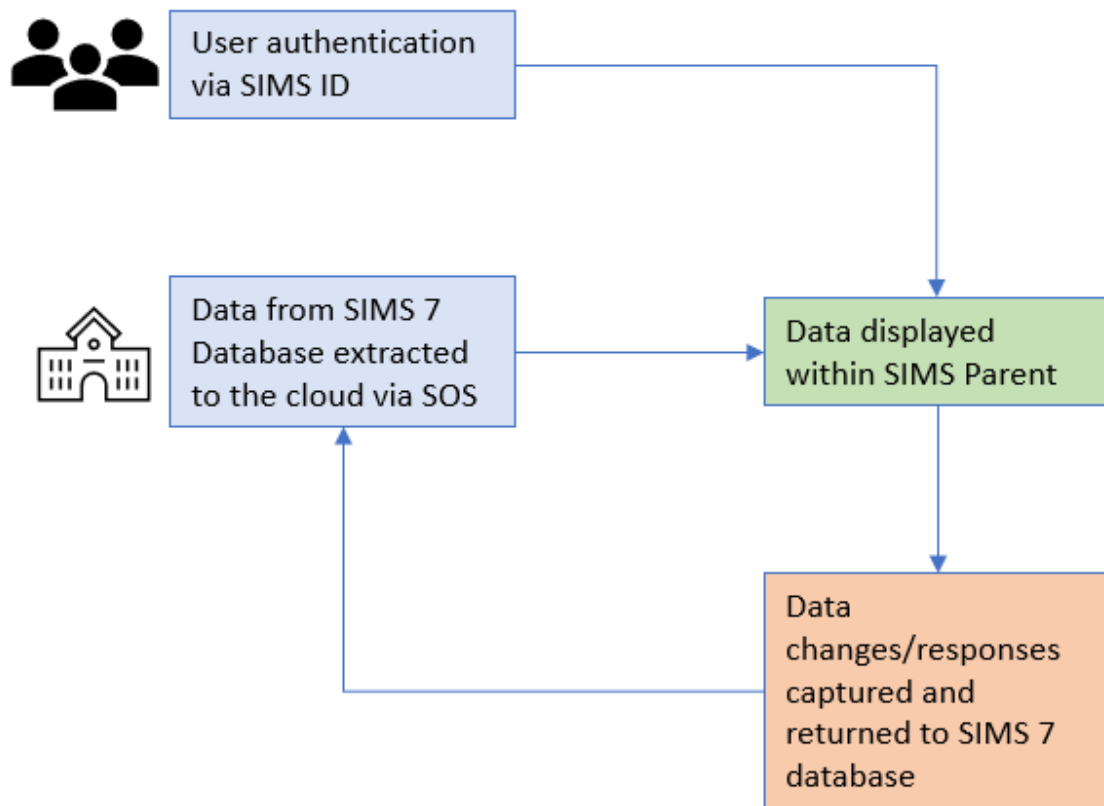
## What personal data is stored within SIMS Parent

SIMS Parent is the service ESS provides to share your student data with respective parents and guardians. Schedule A of the SIMS Terms and Conditions outlines the following data protection annex:

Subject matter	<ul style="list-style-type: none"> <li>Processing of Customer Personal Data relating to students, parents or guardians, contacts, staff and agent records, in line with the customers use of the product.</li> <li>Processing in relation to the investigation and resolution of support incidents, including data fixes.</li> <li>Masking of SIMS databases for use with the SIMS development teams.</li> </ul>
Duration of the processing activity	<p>As required during the Agreement Term, unless otherwise specified below.</p> <ul style="list-style-type: none"> <li>Secure FTP logins and folders will only be kept active for 30 days.</li> <li>Customer data files will be destroyed within 90 days of a support incident being closed.</li> <li>Customer data files will be destroyed within 180 days of the Customer go-live for data conversion work. This is to allow for both school holidays and issues where corrections may be required.</li> <li>Customer data will be destroyed within 90 days of any related support incident being closed.</li> <li>Information relating to support incidents is to be held within CRM or MIS for 6 years + current. This does not include screenshots or data files.</li> </ul>

Nature and purpose of the processing activity	<p>If ESS is providing Software Services, the SIMS application will be hosted by a cloud provider, currently Microsoft Azure, based within the EEA.</p> <p>The collection and use of the SIMS data is for the strict purpose of:</p> <ul style="list-style-type: none"> <li>i) customer support,</li> <li>ii) service desk investigations,</li> <li>iii) the development of software, and</li> <li>iv) analysis and research of aggregated SIMS data in order to make recommendations to educational establishments on improving pupil and staff performance and behaviour. Such data may be used by academic researchers in the UK with personal identifiers removed for academic research purposes.</li> </ul> <p>To provide support and fault resolution to SIMS, ESS requires access to Customer Personal Data to create and grant user access to the application for the following purpose:</p> <ul style="list-style-type: none"> <li>• Provision of 1st, 2nd, 3rd line and escalation support services for SIMS by ESS's help desk.</li> </ul> <p>As a data minimisation control, ESS may mask customer data, where possible, as part of its processing. This masking process has been independently assessed and will result in an output that is no longer personal data. Data used in development will always be of a masked nature.</p>
Type of personal data processed	<ul style="list-style-type: none"> <li>• Student enquiries</li> <li>• Applicants</li> <li>• Students</li> <li>• Contacts</li> <li>• Staff</li> <li>• Agents</li> </ul> <p>This data may include but is not limited to:</p> <ul style="list-style-type: none"> <li>➤ Name, date of birth, gender, ethnicity, nationality, religion</li> <li>➤ Address, telephone and email details</li> <li>➤ Contacts, agents and agencies</li> <li>➤ Dietary and medical information</li> <li>➤ SEN and welfare information</li> <li>➤ Behaviour, achievement, detention and exclusion occurrences</li> <li>➤ Assessment, attendance, timetable and examination details</li> <li>➤ Contract and employment records</li> <li>➤ Staff performance and appraisal information</li> <li>➤ Student enquiries</li> <li>➤ Linked documents from the document server</li> </ul>

## High level flow diagram of data from receipt through to deletion within the product



## Where is my organisation's data hosted?

All data is held within the EU Azure data centres, with redundancy at geographically separate locations.

## Who has access to my organisation's personal data?

ESS ensures there are multiple preventative methods in place to prevent unauthorised access to customer data. We ourselves will not view your data unless you have explicitly given permission, for example during the investigation of a problem with the service.

## What sub-processors / third parties process personal data?

ESS may appoint additional Sub-Processors to assist it in providing the Service and Processing Personal Data. Such processors act only under written instructions with formal contracts established, which are always consistent with security and compliance obligations placed upon ESS. Any such sub-processing takes place in full compliance with data protection law, and customers are provided with opportunity to object to any new sub-processors.

Sub-processors [depending on customer usage] may include:

- Microsoft Azure – to manage our secure enterprise datacentres
- Security Providers – to protect our systems from attack

Please note – MIS data collected for support purposes may be kept in our enterprise business systems. Please refer to the SIMS Ts&Cs for more information.

## What non-EEA and/or non-UK transfers take place?

ESS platforms are hosted only within the UK.

Non-EEA processing may include support escalations, which require non-EEA development teams to access data remotely.

Personal data may be processed outside of the EEA only with the necessary safeguards and compliance requirements, in full adherence with data protection law.

## What is the legal basis for processing my organisation's personal data?

As the data controller, it is our customers' responsibility to define their legal basis for processing personal data within SIMS Connected.

## What product usage/monitoring information do you collect when my organisation uses SIMS Parent?

SIMS Parent records anonymous telemetry data on how the product is used (the areas and features) to improve its functionality. SIMS Parent does monitor the performance and usage of the environment to ensure service continuity.

## How is my organisation's personal data collected and added into SIMS Parent?

Personal data displayed within SIMS Parent is taken directly from the customer's SIMS 7 instance.

## How can SIMS Parent support my organisation with its compliance to GDPR?

Where applicable, provide information on how the software can help customers honour the rights of the data subjects:

- Right to be informed – SIMS Parent enables the customer to add a link to their privacy notice within the product
- Right to rectification – SIMS Parent allows users to amend their own personal details within the product and reflected within the customer's SIMS 7 instance.

## Is there any functionality within the software that supports automated decision making?

### How does this functionality work?

SIMS Parent does not offer functionality specifically intended to support automated decision making.

## Cookie Information

If you would like information about what cookies are and how to control or delete them, we recommend you visit <http://www.aboutcookies.org/> for detailed guidance.

SIMS Parent uses the following cookies:

Cookie Name	Description	Expiry Duration (days)
ai_authUser	This helps us to proactively analyse the performance of the site and its infrastructure	
User 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	

## What controls are there within SIMS Product to protect my organisation's data?

Think about and document detail around controls such as, but not limited to:

- Encryption (at rest and in transit)
- Patch management
- Firewalls
- Testing
- AV
- Masking of data
- Pen testing
- Disaster recovery



## How long do you keep my organisation's data for, once we have off-boarded?

Once a request for offboarding has been made and the required checks have been performed, all data will be deleted from the SIMS Parent infrastructure within 30 days.