



## **THIRD PARTY SYSTEMS PRIVACY NOTICE**

### **Third Party Systems**

#### **What does this privacy notice cover?**

The school uses a number of third-party providers who process personal data on our behalf. They provide a range of services including online services we use to aid teaching. This privacy notice is to make it easier for you to identify what providers we use and why.

#### **Who is the Data Controller for the processing of my personal data?**

Hoole C. of E. Primary School is the Data Controller for any of the personal data processed – that is collected, stored or otherwise used - by the school. This means we are responsible for making decisions about what data we collect, how we use it who we share it with and how long we keep it.

Where we use a third-party provider to process personal data on our behalf, they are the school's data processor and can only use the data under strict instruction from the School.

All third-party providers have signed the school's data processing agreement to certify that they understand their responsibilities, know they cannot use the data for any other purpose and handles any data in a secure and responsible manner.

#### **What are 3<sup>rd</sup> party suppliers and what do you use them for?**

When we talk about third-party providers or systems we talk about organisations or services that we cannot deliver ourselves and look to other organisations to provide. So, this could be, for example HR support we contract of Cheshire West or Chester Council or it may be an interactive online maths game we purchase off an online company to help pupils develop their maths skills.

We currently use third-party providers for a range of services that require us to provide different levels of personal data – this can be data relating to staff or pupils – to allow them to work with us.

There is a list of the third-party providers we currently used later in this notice.

#### **What allows you to use my personal data?**

As a Data Controller, the school must have a 'lawful basis' for processing personal data and this includes our sharing the data with a third-party provider. This will depend on our reason for contracting with a supplier and the service they provide.

Details of the lawful basis for each third-party provider is provided later in this notice, but it is important to remember that the legal basis that allows us to collect and use your personal data may well be different from the basis that allows us to contract to a third-party.

### **How long will you store my personal data for?**

The data we provide to third-party providers is held by the school in line with our retention schedules. They are provided this data to use on behalf of the school under contract and when the contract comes to an end they must return or delete the data they hold.

Should a pupil or member of staff leave the school before the end of any such contract, we will notify the supplier that this data must be deleted from the system/records at that time.

### **Will they share my data with anyone else?**

Third-party providers contracted to the school can only share your personal data under specific instruction from the school. We will tell you under what circumstances they can share data and who they will share this data with.

### **What rights do I have over how you use my data?**

Data Subjects have a number of rights relating to their personal data which can be enforced against the Controller. These rights can be dependent on our legal basis for processing data so not all are absolute.

- **Right to be informed:** You have the right to be told what Personal Data the school collects and stores about you and how it's used.
- **Right of Access:** You have a right to ask for a copy of any personal information that we hold about you, or your child. This is your most important right and always applies, although there may be reasons why we cannot provide all of the information you request.
- **Right of Rectification:** You can ask us to correct any information we hold that you think may be inaccurate, as well as to complete any information you think is incomplete.
- **Right to Erasure:** This is sometimes called the 'right to be forgotten' meaning that, in some cases, you can ask us to delete information we hold about you. The Right to Erasure is not absolute, this means it is not automatic, and in the majority of cases we may be unable to delete the information we hold. Where we cannot comply with your request, we will explain why.
- **Right to Restriction of Processing:** You may have the right to limit how we use your data and this could include stopping us from deleting it. You can generally do this if you are questioning the accuracy of the information we have or the way in which we are using it.
- **Right to Object to Processing:** You also have the Right to Object to how we process your information. This is similar to the Right of Restriction but means we have to stop using your information. If we are unable to comply with your request, it is our responsibility to prove why we should be able to continue to process your information. If you are objecting to your information being used for marketing purposes, we would have to stop using your information immediately.
- **Right to Data Portability:** You have a right to ask for us to transfer information you gave to us electronically and which is automatically processed, to another organisation. In reality, this right will rarely apply to information we deal with as a school.
- **Rights related to automated decision making:** Where information is used for the purposes of profiling or a decision is made solely by automated means with no human involvement,

you have the right to object and ask for human intervention in any decision. The school does not have any automated decision-making function.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

### Our 3<sup>rd</sup> party suppliers

Name	Information shared	Reason	Legal Basis
<b>SIMS.net (Capita)</b>	All information held about the student is uploaded to SIMS.net.  Staff have permissions-controlled access to this.	SIMS is our Management Information System and houses all the information categories detailed above.  Staff need access to this in order to perform the basic duties of their role (e.g. to inform teaching and learning, to be able to contact parents).	Public Task to allow us to: <ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to monitor and report on pupil progress</li> <li>to provide appropriate pastoral care</li> <li>to assess the quality of teaching and learning</li> <li>to safeguard pupils</li> </ul>
<b>CPOMS</b>	All information held about the student is uploaded to CPOMS and has access to an amount of data from the SIMS.net database.  Staff have permissions-controlled access to this.	CPOMS is our safeguarding and pupil welfare Management Information System and houses all the information categories detailed above.  Staff need access to this in order to perform the basic duties of their role	Public Task to allow us to: <ul style="list-style-type: none"> <li>to provide appropriate pastoral care</li> <li>to safeguard pupils</li> </ul>
<b>SIMS Parent (Capita)</b>	SIMS Parent Lite has access to an amount of data from the SIMS.net database.  This includes name, surname, contact details, homework, timetable, attendance, achievements, behaviour, assessment, medical information, census data such as mode of transport to school, and reports.	SIMS Parent Lite is an app that displays to parents the information held on their child in SIMS.net.  Parents then have the right to ask for data to be erased or rectified in line with the UKGDPR. They can rectify data themselves.  When activated, Apple Push Notifications can be	Public Task to allow us to: <ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to monitor and report on pupil progress</li> <li>to provide appropriate pastoral care</li> <li>to assess the quality of teaching and learning</li> </ul>

	This information is accessed for all students in all year groups.	sent to summarise events such as new behaviour or achievements. This means that some third party processing takes place.	<ul style="list-style-type: none"> <li>to safeguard pupils</li> </ul>
<b>Evolve</b>	Limited pupil data (name, gender and class) is uploaded to the Local Authority Evolve Visits platform.	EVOLVEvisits is an online risk management system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	<p>Public Task to allow us to:</p> <ul style="list-style-type: none"> <li>to safeguard pupils</li> </ul>
<b>Insight</b>	This links directly to SIMS.net and looks at information such as name, surname, year group, tutor group, and class details, SEN, FSM, PP, LAC, Classes, Assessment Data	We use Insight to track students' assessment data through the school. This is analysed and pupils needing academic, pastoral or other support are identified.	<p>Public Task to allow us to:</p> <ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to monitor and report on pupil progress</li> <li>to provide appropriate pastoral care</li> <li>to assess the quality of teaching and learning</li> <li>to safeguard pupils</li> </ul>
<b>FFT Aspire</b>	Name, DOB, UPN, Gender, date of admission to school	FFT Aspire is able to calculate using the students' scores where the student should be at various points in their education. We use this information to assess ourselves.	<p>Public Task to allow us to:</p> <ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to monitor and report on pupil progress</li> <li>to provide appropriate pastoral care</li> <li>to assess the quality of teaching and learning</li> </ul>

<b>Microsoft</b>	Name, year group, tutor group and membership of class groups	Provides students with access to the suite of Microsoft Office 365 software (Word, Excel, OneNote, Teams etc.)	Public Task to allow us to: <ul style="list-style-type: none"> <li>to support pupil learning</li> <li>to monitor and report on pupil progress</li> <li>to provide appropriate pastoral care</li> <li>to assess the quality of teaching and learning</li> </ul>
<b>WONDE, Parent Mail &amp; School Spider</b>	<p>Parents obtain access via their email address and mobile phone number which must match those held by the school. We use parents' email addresses to send home letters and important documents.</p> <p>This is the school's Payment System. We use this to facilitate parents making online payments towards school trips and the like.</p> <p>Parents are not required to use this system.</p>		<p>Consent</p> <p>Parents are not required to use this system and details will only be shared where parents have consented to use this system.</p>
<b>WONDE &amp; E Vouchers</b>	<p>This links directly to SIMS.net and looks at information such as name, surname, year group, tutor group, and class details.</p> <p>Parental contact information is also accessed in order to provide parents a log in to the system.</p>	<p>This service allows schools to distribute Household Support Meal Vouchers to eligible families.</p> <p>Parents are not required to use this system.</p>	<p>Public Task to allow us to:</p> <ul style="list-style-type: none"> <li>to provide appropriate pastoral care to families in need.</li> </ul>
<b>Parents Evening System (School Cloud Systems)</b>	<p>This links directly to SIMS.net and looks at information such as name, surname, year group, tutor group, and class details.</p> <p>Parental contact information is also accessed in order to provide parents a log in to the system.</p>	<p>This service allows parents to book their Parents Evening appointments online and allows teachers and admin staff to manage bookings.</p> <p>Parents are not required to use this system.</p>	<p>Consent</p> <p>Parents are not required to use this system and details will only be shared where parents have consented to use this system.</p>

<p><b>TT Rock Stars,</b></p> <p><b>SPAG.com,</b></p> <p><b>My Maths,</b></p>	<p>Students are given a username and password to access the site.</p>	<p>These are online programmes designed to encourage progress in reading, maths etc and is used by our student support staff to encourage students to read.</p>	<p>Public Task to allow us to:</p> <ul style="list-style-type: none"> <li>• to support pupil learning</li> <li>• to monitor and report on pupil progress</li> <li>• to assess the quality of teaching and learning</li> </ul>
<p><b>School Comms</b></p>	<p>This is the school's Payment System. We use this to facilitate parents making online payments towards school trips, locker deposits and the like. Name, Tutor group, Address, Post Code and parental email address are extracted. A secure username and password are generated per student for parents to use.</p> <p>An exporter called WONDE sits between Capita SIMS and Wisepay to facilitate an automatic upload and refresh of data. This eliminates the potential for human error and means that data is removed from Wisepay as soon as the student has been marked as left in SIMS.</p> <p>Parents are not required to use this system.</p>	<p>Consent</p> <p>Parents are not required to use this system and data will only be passed to Wisepay where parents have consented to use the system.</p>	

### What can I do if I am unhappy with how you use my data?

If you are unhappy with how we use your personal data, want to report a possible breach or just want further information, please contact Clare Watling, Deputy Head at Hoole C. of E. Primary School in the first instance. If you wish to complain directly to the school's Data Protection Officer by email or post.

- Email: [schoolsdp@veritau.co.uk](mailto:schoolsdp@veritau.co.uk)

You also have the right to complain to the Information Commissioner's Office using the following details:

- [Information Commissioner's Office \(ICO\) website](#)
- By post: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Telephone: 0303 123 1113