

# Our contact details:

Name: School Transition Limited

Address: St Peter's House, Mansfield Road, Derby, DE1 3TP

Phone Number: 01332 854180

E-mail: enquiries@schooltransition.co.uk

## The type of personal information we collect:

We currently collect and process the following information:

User Data:
<ul> <li>The following Personal Data will be held for school users of the Transition Portal:</li> <li>Personal information (such as name, job title, email address, employment, IP address, Session IDs)</li> <li>Interactions between Transition Portal Users and School Transition Limited, such as support tickets raised or queries made with our support team</li> <li>Information collected automatically relating to the Transition Portal to include information eg a user's IP address, device type, unique device identification numbers and login information, browser-type and version, time zone setting, operating system and platform, broad geographic location (e.g. country or city-level location) and other such technical information</li> </ul>
Student Data:
<ul> <li>The following types of student personal data will be processed:</li> <li>Personal information (such as, but not limited to, name, unique pupil number, primary and secondary school)</li> <li>Characteristics (such as, but not limited to, ethnicity, language, nationality, country of birth and free school meal eligibility)</li> <li>Attendance information (such as, but not limited to, attendance percentages, number of absences and absence reasons)</li> <li>Assessment information (such as, but not limited to, teacher grade judgement)</li> <li>Relevant medical information</li> <li>Special Education Needs information</li> <li>Safeguarding information (such as, but not limited, exclusions)</li> <li>Safeguarding information (such as, but not limited to, involvement of other agencies)</li> </ul>

## How we get the personal information and why we have it:

The personal information we process is provided to us by the schools using the Transition Portal. We receive information from the following sources in the following scenarios:

• Primary schools provide details of all year 6 pupils due to transition to secondary schools including: student first name, surname, date of birth, gender and Unique Pupil Number (UPN).



• Following National Offer Day, secondary schools provide details of year 6 pupils due to transition to them in year 7: including source primary school, destination secondary school, pupil first name, surname, date of birth, gender, application reference number and UPN.

The pupil information is then used to securely transfer pupil data from their source primary school to their destination secondary school.

Schools also provide details of the users they would like to have access to the platform to enter pupil data. Users then manually enter pupil data into the portal. We collect this data for the following reasons:

- To fulfil our contractual obligations to the schools taking part in using the Transition Portal
- To allow us to securely transfer student data for the purpose of supporting students

We use the information given to us in order to allow you, the user, secure access to the Transition Portal. By providing your personal details we are also able to notify our users of key information about the Transition Portal.

User and pupil information entered into the Transition Portal will only be shared with agreed, named third party sub processors for the purpose of supporting transition. The list of approved third party processors will be outlined on the School Transition website and schools will be notified of any changes to this list.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

#### (a) We have a contractual obligation.

We have a contractual obligation with the schools accessing the Transition Portal to transfer student data.

#### (b) We need it to perform a public task.

Art. 6(1)(e) UK GDPR defines that "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller". The task for which data processing is necessary in this case is a task carried out in the public interest of enabling schools to effectively transfer data between schools for the purpose of transition.

## How we store your personal information:

School Transition use certain subcontractors and sub processors to assist in providing our School Transition services. A sub processor is a third-party data processor engaged by School Transition, who has or potentially will have access to or process data. School Transition use different types of sub processors to perform various functions as explained below. School Transition refer to third parties that do not have access to or process data but who are otherwise used to provide the services as "subcontractors" and not sub processors.



Sub processors for School Transition are listed below:

Amazon Web Services: The School Transition application, infrastructure and databases are hosted on Amazon's servers and the encrypted, dedicated servers at their EU datacentre.

Microsoft: Information is securely stored by Microsoft, a Cloud Provider.

Google Analytics; Google Analytics is the analytics provider that we use to provide us with website statistics relating to which School Transition features you have used. We use this information so we can improve and optimise your experience when using School Transition.

Additional sub processors: Further processing of the data will be undertaken by agreed, named, third parties, such as, but not limited to, Link ICT Services Limited, Derby City Council and the School Development Support Agency to enhance the transition support offered to schools and pupils. Details of these sub processors will be made available on the School Transition website here and any updates to the list of agreed sub processors will communicated to users of the Transition Portal.

Data will only be retained for as long as is necessary for the needs of organisations utilising the Transition Portal services and never beyond the duration of our Data Processing Agreement with organisations. This includes subsequent, consecutive Data Processing Agreements. Upon expiry of our final Data Processing Agreement, data will be securely deleted.

### Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

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.



If you wish to make a request, please contact us at

School Transition Limited

St Peter's House

Mansfield Road

Derby

DE1 3TP

Phone Number: 01332 854180

Email:enquiries@schooltransition.co.uk

## How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at School Transition Limited, using the details above.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk