



Primary to Secondary Transition Portal

Privacy Policy – Plymouth and Surrounding Areas

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: The following Personal Data will be held for school users of the Transition Portal: <ul style="list-style-type: none">• Personal information (such as name, job title, email address, employment, IP address, Session IDs)• Interactions between Transition Portal Users and School Transition Limited, such as support tickets raised or queries made with our support team• 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
Pupil Data: The following types of pupil personal data will be processed: <ul style="list-style-type: none">• Personal information (such as, but not limited to, name, unique pupil number, date of birth, primary and secondary school, parental contact details and address)• Characteristics (such as, but not limited to, ethnicity, language, nationality, country of birth and free school meal eligibility)• Attendance information (such as, but not limited to, attendance percentages, number of absences and absence reasons)• Assessment information (such as, but not limited to, teacher grade judgement)• Relevant medical information• Special Educational Needs information• Behavioural information (such as, but not limited, exclusions)• Safeguarding information (such as, but not limited to, involvement of other agencies)

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

Schools provide details of the users they would like to have access to the platform to enter pupil data. 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.



Users then upload and/or manually enter pupil data into the portal, this allows us to fulfil our contractual obligations to the schools taking part in using the Transition Portal and to securely transfer pupil data for the purpose of supporting pupils.

The pupil 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 school users provide details of all year 6 pupils due to transition to secondary schools including: pupil first name, surname, date of birth, gender and Unique Pupil Number (UPN).
- Primary schools continue to add key information to support transition, as outlined in the type of information we collect.
- Following confirmation of year seven place allocations for pupils transitioning to secondary school, Plymouth City Council update the Transition Portal with admissions information, including:
 - destination school
 - pupil information: first name, surname, date of birth, gender, application reference number and UPN
 - parental contact and address details to be shared with the destination school
- Plymouth City Council then continue to update school destinations on the Transition Portal as places are changed for pupils following National Offer Day.
- Pupil data will not be released to destination schools until their school place has been accepted, as per Plymouth City Council's admissions process, or until the second round of allocations takes place.

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.

Lawful basis for processing user data:

As part of our Privacy Policy it is necessary to outline the lawful basis for processing data. Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing user information is:

(a) We have a legitimate interest:

To provide our services to users of the Transition Portal it is necessary to process user data to provide access to and fulfil our services.

Lawful basis for processing pupil data:

For pupil data, School Transition act as the Data Processor. Schools are the Data Controller for pupil data entered into the Transition Portal. For the lawful basis for



processing pupil information it is the responsibility of the Data Controller to reflect this in their Privacy Policy.

How we store your information:

School Transition use certain 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 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 "sub-contractors" 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.

Link ICT Services Limited: Access to user information to support users in accessing the Transition Portal.

Additional sub processors: Further processing of the data may be undertaken by agreed, named, third parties, subject to acceptance by organisations accessing the Transition Portal. 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 Sharing:

To support the engagement by schools and the implementation of the Transition Portal in the Plymouth area, the following information may be shared with Plymouth Place-based School Improvement:

- Contact information for users of the Transition Portal
- Engagement information, this may include whether a school are signed up to use the portal, if they have uploaded pupils and form completion progress
- Statistical information relating to user and pupil numbers.

No pupil personal information would be shared with Plymouth Place-based School Improvement.

Data Retention:

Pupil data will only be available until 31st October of the same year the pupil transfers to secondary school, after which the data will be securely deleted from our systems.



We will retain individual user data for as long as the active relationship lasts with your organisation.

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 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>