



Nursery to Reception 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: • 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
Children's Data:
The following types of children's personal data will be processed: • Personal information (such as, but not limited to, name, date of birth, address, early years' provider, school destination, parental contact details) • Photographs of children to support recognition by their new school • Characteristics (such as, but not limited to, ethnicity, language, nationality, country of birth, funding eligibility) • Attendance information (such as, but not limited concerns around absences and absence reasons) • Learning information (such as, but not limited to, practitioner comments around areas of learning) • Relevant medical information (including but not limited to allergies, medical conditions) • Special Educational Needs information • Behaviour and social information • Safeguarding information (such as, but not limited to, involvement of other agencies)

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

Organisations using the portal provide details of the users they would like to have access to the platform to enter and receive children's 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 children's data into the portal, this allows us to fulfil our contractual obligations to the organisations taking part in using the Transition Portal and to securely transfer children's data for the purpose of supporting their transition to starting school.

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

- Early Years' provider users provide details of children due to start school in the September of the following academic year including: the child's first name, surname, date of birth, gender, first line of address and postcode. This creates a unique record for the child.
- Early years' settings continue to add key information to support transition, as outlined in the types of information we collect.
- Following confirmation of reception place allocations for children starting school, Plymouth City Council update the Transition Portal with admissions information, including:
 - destination school
 - children's 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 children following National Offer Day.
- Children's 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 children's 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 children's data:

For children's data, School Transition act as the Data Processor. Early years' providers, schools are the Data Controllers for children's data entered and received within the Transition Portal. For the lawful basis for processing children's information it is the responsibility of the Data Controller to reflect this in their Privacy Policy and take the necessary actions to ensure that sharing data has a lawful basis.

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 early years' providers schools and the implementation of the Transition Portal in the Plymouth area, the following information may be shared with the Early Years South West Stronger Practice Hub and Plymouth City Council:

- Contact information for users of the Transition Portal
- Engagement information, this may include whether an early years' provider or school are signed up to use the portal, if they have added children to the portal and form completion progress
- Statistical information relating to number of users and children added to the portal.

No children's personal information would be shared with the Stronger Practice Hub or Plymouth City Council.

Data Retention:

Children's data will only be available until 31st October of the same year the child starts 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>