

## Details of any external data processors

Caerphilly schools may decide to use one or more of the below external data processors to act on their behalf and support their statutory function. Article 29 states that a Data Processor should only process personal data in line with the Data Controller's (i.e. the school) instructions, unless it is required to do otherwise by law.

### CAPITA **Capita SIMS (data management)**



**Student data processed:**

**pupil name and contact details, parent name and contact details, emergency contact details, pupil attendance, any dietary or medical needs, and information regarding Special Educational Needs**

Capita SIMS is a Management Information System (MIS) used to store pupil information collected directly from parents/carers when a pupil joins the school. SIMS is hosted at a Microsoft Azure datacentre in the UK and data is encrypted at rest in cloud storage and as it travels across the internet or within networks.

<https://www.capita-sims.co.uk/gdpr> |

<https://www.capita-sims.co.uk/privacy-notice>

### CAPITA **Capita SIMS MyConcern (safeguarding)**



**Student data processed: pupil legal and preferred name, date of birth, gender, class, school, details of safeguarding concern**

Capita SIMS MyConcern is used by the school to record safeguarding concerns. Information is inputted onto a secure digital platform and a notification email is sent to the relevant person when the case is updated. This email does not contain any details of the incident or individuals involved and the professional receiving the email is required to log-in to review the data.

<https://www.capita-sims.co.uk/gdpr> |

<https://www.capita-sims.co.uk/privacy-notice>

### CAPITA **Capita GDPRiS (data management)**



**Data processed: staff name, complainant name, contact details, and summary of data breach**

Capita GDPRiS is a cloud-based data protection monitoring solution used to record and manage data breaches reported, audit progress, and map data held by the School. The solution is a product from Capita SIMS, which is hosted at a Microsoft Azure datacentre in the UK and data is encrypted at rest in cloud storage and as it travels across the internet or within networks.

<https://www.capita-sims.co.uk/gdpr> |

<https://www.capita-sims.co.uk/privacy-notice>



### **CCTV (public monitoring)**

**Student data processed: surveillance footage and location of pupils and their families whilst on the school premises**

CCTV is used both inside and outside the school to ensure the safety of all staff, pupils, and visitors. The school CCTV is monitored by CCBC and data is stored in Tir-Y-Berth.

<https://www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Privacy-notice>



### **Halo Support (visitor sign-in system)**

**Student data processed: pupil name, reason for lateness, class**

**Visitor data processed: visitor name, car registration number, reason for visit, photograph/image**

Halo Support is used to assist in processing personal data. The system is in place for signing in and out for staff, visitors, and pupils. Data is stored on the iPad in school and is not transferred to Halo support. The system will provide reports of attendance, time in and time out, and will be emailed via the schools @caerphilly.gov.uk account.

<https://www.halo.support/gdpr/>



### **InVentry Limited (visitor sign-in system)**

**Student data processed: pupil name, reason for lateness, class**

**Visitor data processed: visitor name, car registration number, reason for visit, photograph/image**

InVentry is used to assist in processing personal data. The system is in place for signing in and out for staff, visitors, and pupils. Data is stored on the iPad in school and sits on our network. InVentry processes data when the school use the support desk, ID badge making, and InVentry Anywhere services. Data is stored on a secure cloud server owned and maintain by the company that is regularly purged of information.

<https://inventry.co.uk/gdpr-policies/>



### **Thrive Online (emotional/social development support)**

**Student data processed: pupil names, UPN, class, date of birth**

Thrive Online is used to support pupils with building on progress and development in the curriculum and everyday life experiences. Any personal information provided to Thrive will be held within the European Economic Area. Only some pupils are involved in this intervention.

<https://www.thriveapproach.com/privacy-policy/privacy-policy-2/>



### **INCERTS The Assessment Foundation (pupil progress)**

**Student data processed: pupil name, class, date of birth, educational performance and progress, photograph/image**

INCERTS The Assessment Foundation supports the school to track pupil progress and is an online assessment tool. It helps us track what your child knows, understands, and can do so that we can help plan the next steps. INCERTS also supports reporting progress to parents and carers.

<http://www.assessmentfoundation.org/privacy.html>



### GL Assessment (pupil assessment)

**Student data processed: pupil name, class, date of birth, educational performance and progress**

GL Assessment is used by the school for English, Reading and Maths assessments. We share information for assessments to be standardised. Passwords are changed every 6 months to safeguard users. Any access to the data by the company is tracked and a detailed audit log maintained together with the reasons for access.

<https://www.gl-assessment.co.uk/support/privacy-policy/> |

<https://www.gl-assessment.co.uk/media/286590/data-policy-apr-2018.pdf>



### Evolve (risk assessments)

**Student data processed: pupil name, class, Additional Learning Needs, measures to support pupil**

Evolve assists the school in risk assessing school trips for staff, visitors, and pupils. Data is stored in databases within the United Kingdom and each server has Proactive Threat Monitoring to detect any intrusion attempts.

<https://evolve.edufocus.co.uk/evco10/privacy.asp> |

<http://edufocus.co.uk/pages/evolve/gdpr.asp>



### Cunninghams (cashless catering)

**Student data processed: pupil name, class, date of birth, biometric data (i.e. fingerprints), allergies, meal records**

Cunninghams provide a cashless catering system to support pupils when paying for school lunches. The system manages pupil identification methods to online payments and generates daily, weekly or monthly reports. Schools have access to reports on meals consumed, overdue accounts, and food wastage.

<https://www.crbcunninghams.co.uk/mint-project/uploads/953895657.pdf>

<https://www.crbcunninghams.co.uk/mint-project/uploads/940428611.pdf>



### Caerphilly County Borough Council (cashless catering)

**Student data processed: pupil name, class, date of birth, biometric data (i.e. fingerprints), allergies, meal records**

Caerphilly County Borough Council provide a cashless catering system to support pupils when paying for school lunches. The system manages pupil identification methods to online payments and generates daily, weekly or monthly reports. Schools have access to reports on meals consumed, overdue accounts, and food wastage. A sub-processor (Uniware) is used to deliver the service.

<https://www.caerphilly.gov.uk/Services/Schools-and-learning/School-dinners-and-breakfast-clubs/Cashless-catering-in-secondary-schools>

<https://www.caerphilly.gov.uk/CaerphillyDocs/FOI/PrivacyNotices/Cashless-Catering.aspx>



### Parent Pay (payment solution)

**Student data processed: pupil name, class, gender, date of birth, parent/carer name and contact details, IP address, payment history and balances, parent/carer payment card details**

Parent Pay gives parents/carers the option to securely pay for Educational visits, school dinners, after school clubs, and school uniform. The company use a range of service providers to help deliver their services (e.g. Amazon Web Services, Microsoft Azure, and Experian). Some of the companies supporting services may use cloud platforms that operate outside of the EEA.

<https://www.parentpay.com/parentpay-and-gdpr/>  
<https://www.parentpay.com/privacy-policy/>



### Edukey Class Charts (behaviour management)

**Student data processed: UPN, pupil name, gender, date of birth, class, parent/carer name and contact details.**

Edukey Class Charts is used to track how students progress over the school day with real time lesson attendance information and helps the school to reward positive behaviour with achievement points. The app allows parents/carers to view their child's progress. All data is encrypted when stored on Google Cloud servers in the UK and when it travels across the internet.

<https://www.edukey.co.uk/privacy/> | <https://www.edukey.co.uk/gdpr-compliance/> | [https://www.edukey.co.uk/wp-content/uploads/GDPR\\_Summary.pdf](https://www.edukey.co.uk/wp-content/uploads/GDPR_Summary.pdf)



### Edukey Provision Mapping (intervention)

**Student data processed: UPN, pupil name, gender, date of birth, class, Additional Learning Needs, medical condition, educational performance and progress**

Edukey is used to support the school with learning plans and implementing the Assess – Plan – Do – Review approach from the SEND Code of Practice. The software helps to map out interventions and track the individuals linked to each case. The company routinely carry out vulnerability and penetration testing on their platforms and restrict access to personal data.

<https://www.edukey.co.uk/privacy/> | <https://www.edukey.co.uk/gdpr-compliance/> | [https://www.edukey.co.uk/wp-content/uploads/GDPR\\_Summary.pdf](https://www.edukey.co.uk/wp-content/uploads/GDPR_Summary.pdf)



### Go4Schools (tracking progress)

**Student data processed: UPN, pupil name, date of birth, class, assessment data, behavioural information, parent/carer name and contact details.**

Go4Schools is an online system with several different modules to help in areas such as tracking assessments, rewarding positive behaviour, producing progress reports, and setting homework. The company anonymise data within 4 weeks after subscription cancellation and conduct internal reviews of their data collection, storage and processing practices.  
<https://www.go4schools.com/PrivacyPolicy.aspx>



### Eduspot Teachers2Parents (home-school communications)

**Student data processed: pupil names, classes, parent/carer names, and contact details**

Eduspot Teachers2Parents is linked with Capita SIMS via a sub-processor and extracts information. The system is used to keep parents and carers up to date with relevant information regarding any school events, activities, or closures.  
<https://eduspot.co.uk/privacy-policy/>



### Groupcall (home-school communications)

**Student data processed: pupil names, classes, parent/carer names, and contact details**

Groupcall is used to keep parents and carers up to date with relevant information regarding any school events, activities, or closures. The company operate their products using the Microsoft Azure Europe platform and customer data is retained within the European Economic Area (EEA). Messages to staff and contacts are sent without viewing recipient phone numbers or emails.  
[https://www.groupcall.com/privacy#security\\_and\\_performance](https://www.groupcall.com/privacy#security_and_performance)



### Schoop (home-school communications)

**Student data processed: pupil names, classes, parent/carer names, and contact details**

The system is used to keep parents and carers up to date with relevant information regarding any school events, activities, or closures. No information is supplied to the company as a school code is provided when parents/carers download the app.  
<https://www.schoop.co.uk/privacy/> | <https://www.schoop.co.uk/terms/>



## Eduspot BehaviourWatch (attendance and behaviour)

**Student data processed: UPN, pupil name, gender, date of birth, class, parent/carer name and contact details, behavioural and attendance information**

Eduspot BehaviourWatch is used to track how students are getting on at school with real time attendance monitoring and communicate progress with parents/carers. The system helps the school to reward positive behaviour.  
<https://eduspot.co.uk/privacy-policy/>



## Microsoft Outlook (communication)

**Student data processed: pupil name, DOB, Additional Learning Needs, medical and administration, behaviour and safeguarding information, correspondence relating to students and their families**

Microsoft Outlook is an email system that supports the Senior Management Team with business administration and communicating with the Local Authority. Data is stored in UK Data Centres and Microsoft control staff access to personal data. Microsoft ensure data is encrypted when stored in their Data Centres and when it travels across the internet.

<https://www.microsoft.com/en-us/trust-center/privacy/gdpr-overview> | <http://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=3&DocumentTypeId=46>



## G Suite for Education (learning support/communications)

**Student data processed: pupil name, DOB, Additional Learning Needs, medical and administration, behaviour and safeguarding information, correspondence relating to students and their families**

G Suite for Education (i.e. Gmail, Google Drive, Docs/Sheets/Slides) is used by the school to create assignments, communicate with students through a school-wide email system for teachers, provide feedback on student work, and track student progress within classes. Data is encrypted and information is stored securely within UK Data Centres. Google monitor staff access controls and there is a strict security monitoring program in place to detect any unauthorised access to the network or by employees.

<https://cloud.google.com/security/gdpr/resource-center/>



## HWB (national assessments/additional services)

**Student data processed: pupil name, year group, DOB, assessment data, Additional Learning Needs, medical and administration, behaviour and safeguarding information, correspondence relating to students and their families**

HWB is a Welsh Government digital learning website. It allows learners access to Microsoft packages and various other software. Hwb is linked to Captia SIMS and extracts information. All pupils in maintained schools in

Wales must be provided with a secure log-in to the Hwb platform due to mandatory reading and numeracy tests. <https://hwb.gov.wales/privacy>



### **Mathletics (curriculum support)**

**Student data processed: pupil name, username, date of birth, preferences, and email**

Mathletics is used throughout the school. First names appear publically on the website as this makes the students experience more relevant and provides a greater sense of community. The school is not identified with the first name.

<http://static.3plearning.com/mathletics/www/PrivacyPolicy.pdf>



### **Lexia (curriculum support)**

**Student data processed: pupil name, username, date of birth, preferences, and email**

Lexia is a reading resource used to support pupils with building on progress and development in the curriculum and everyday life experiences. The company utilizes standard security measures, such as firewall, controlled access to data, and encryption technology to help protect user information.

<http://www.lexialearning.com/privacypolicy/index.html>



### **Giglets (curriculum support)**

**Student data processed: pupil name, username, date of birth, preferences, and email**

Giglets is a literacy resource used to support pupils with building on progress and development in the curriculum and everyday life experiences. The information is stored on secure servers and uses cookies to collect statistical data about user browsing actions and patterns. This does not identify any individual.

<https://giglets.com/Legal?ShowPage=664&p=Privacy%20&%20Cookie%20Policy>



### **Purple Mash (curriculum support)**

**Student data processed: pupil name, username, date of birth, preferences, and email**

Purple Mash is an education resource used to support pupils with building on progress and development in the curriculum. The company does not transfer personal data outside of the European Economic Area and access to information is restricted to those who have a business need to know.

<https://2simple.com/GDPR/>

## Details of transfers to any countries outside of the European Economic Area (EEA)

Caerphilly schools may decide to use one or more of the below applications to celebrate pupil learning. These operate outside the of the EEA and may transfer, store, or process personal data outside of the EEA as a result.



### ClassDojo (online learning journal)

**Student data processed: pupil name, date of birth, class, photograph/image, messages by pupil or teacher about learning**

**ClassDojo** is used in school to help promote good behaviour and share learning by adding photos and videos to portfolios created for each pupil. This enables the school and pupils to share class stories and individual progress with parents on a regular basis. ClassDojo is an American company that is certified under the EU-US Privacy Shield framework.

<https://www.classdojo.com/en-gb/privacy/#how-does-classdojo-protect-children-s-personal-information->

<https://www.privacyshield.gov/participant?id=a2zt0000000GnTIAAK&status=Active>



### Seesaw (online learning journal)

**Student data processed: pupil name, date of birth, class, photograph/image, messages by pupil or teacher about learning**

**Seesaw** is a secure online journal where students can document and reflect on what they are learning in class. Pupil work will never be identifiable when using Seesaw apart from in their own file which will be labelled with their first name only. The Seesaw Service is hosted and operated in the United States and complies with the EU-US Privacy Shield Framework. They contract Amazon Web Services to provide data centre and server hosting services.

<https://web.seesaw.me/privacy-policy/> |

<https://www.privacyshield.gov/participant?id=a2zt000000001DLAAY&status=Active>



### Twitter (celebrating success)

**Student data processed: pupil name, photograph/video, class, school**

**Twitter** is a social media website used to celebrate pupil success, activities in school, and provide parents/carers with up to date information. We will always seek consent before publishing images or videos alongside a child's name.

<https://twitter.com/en/privacy>