SIMS helping schools inspire

Supporting GDPR

Best practice Networking Learning

SIMS and GDPR
Spring 2018 UPDATE

The presentation will start at 16:00

Paul Featherstone, Product Manager

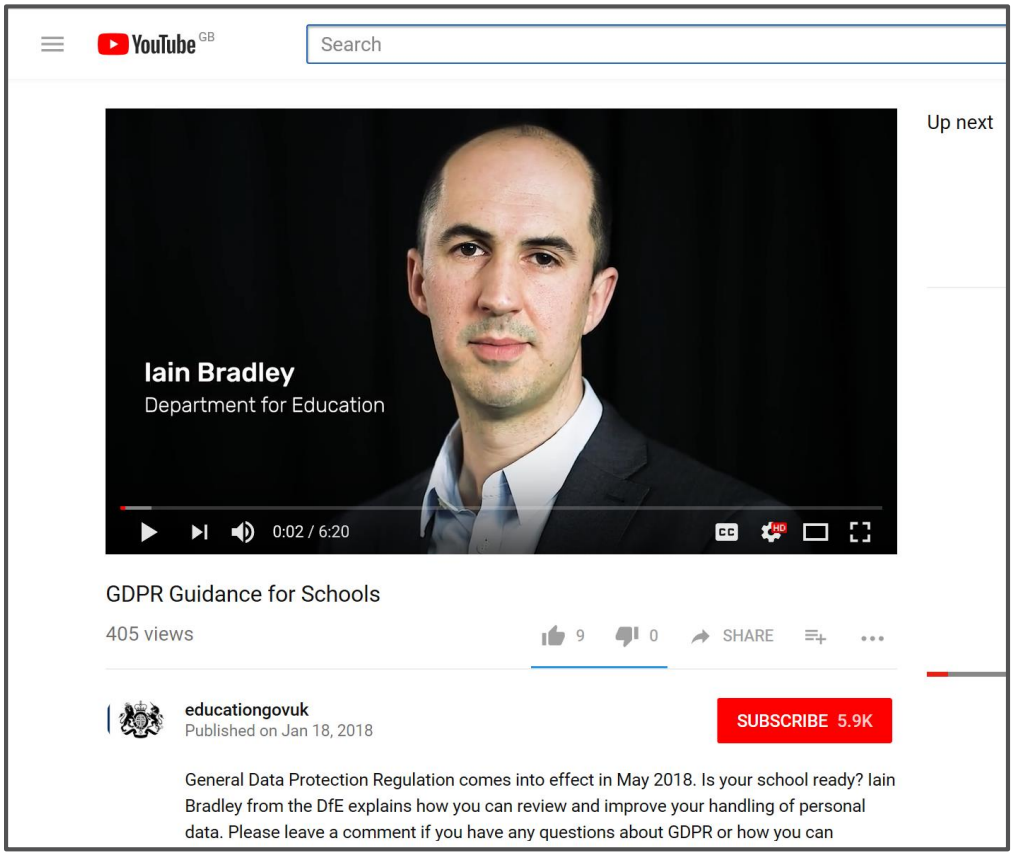
Agenda for this session…

- Introduction
- Update to the Person Data Output
- Supporting Data Retention Policies
- Parent App Lite
- Slides will be sent out after the presentation
- Due to the number of people attending the Webinar, questions will be answered and sent out with the slides

The DPA – 1998 then and now

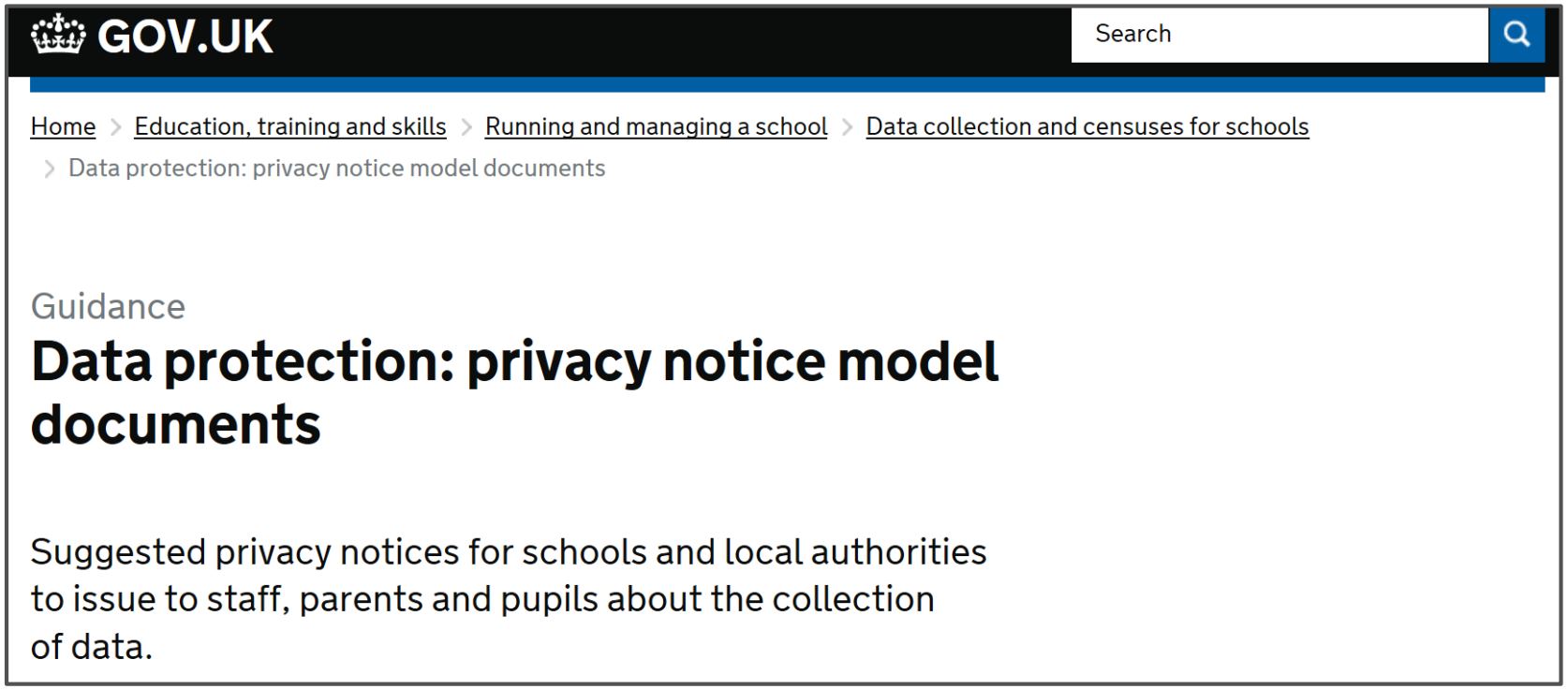
- Google created in 1998, today handles 40,000 search queries a second
- 6 years later Facebook was created
- Twitter came on the scene in 2006
- 2009 saw the invention of WhatsApp
- Instagram was created 8 years ago in 2010

DfE Updates – 18/01/18



https://youtu.be/y09IHXv6u6M

DfE Updates – 18/01/18



https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notices

The GDPR creates some new rights for individuals and strengthens some of the rights that currently exist under the DPA

Individual Rights

- The right to be informed
- The right of access (Subject Access Requests)
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

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Person Data Output Update

- Autumn 2017 SIMS release introduced the Person Data Output
- This Spring we will extend this to cover Staff and Contacts information
  - Permissions
  - Review functionality

Start
LIVE DEMO

The GDPR will introduce a duty on all organisations to report certain types of data breach to the relevant supervisory authority.

Breach notification

- A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This means that a breach is more than just losing personal data.
- A notifiable breach has to be reported to the relevant supervisory authority within 72 hours of the organisation becoming aware of it.

The GDPR will introduce a duty on all organisations to report certain types of data breach to the relevant supervisory authority.

Breach notification

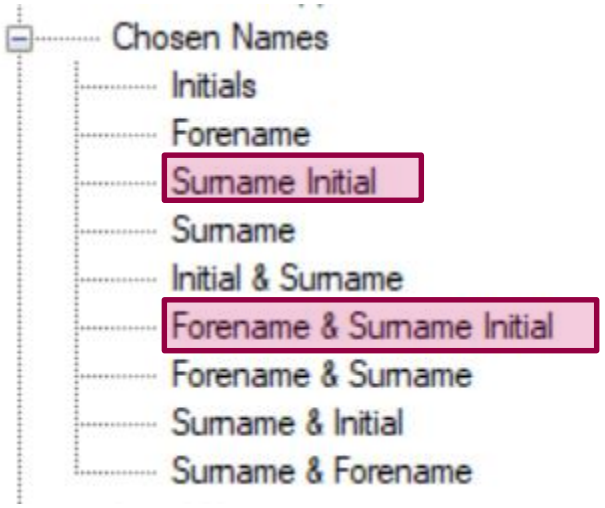
Example

Personal data breaches can include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches

Reporting Dictionary Updates



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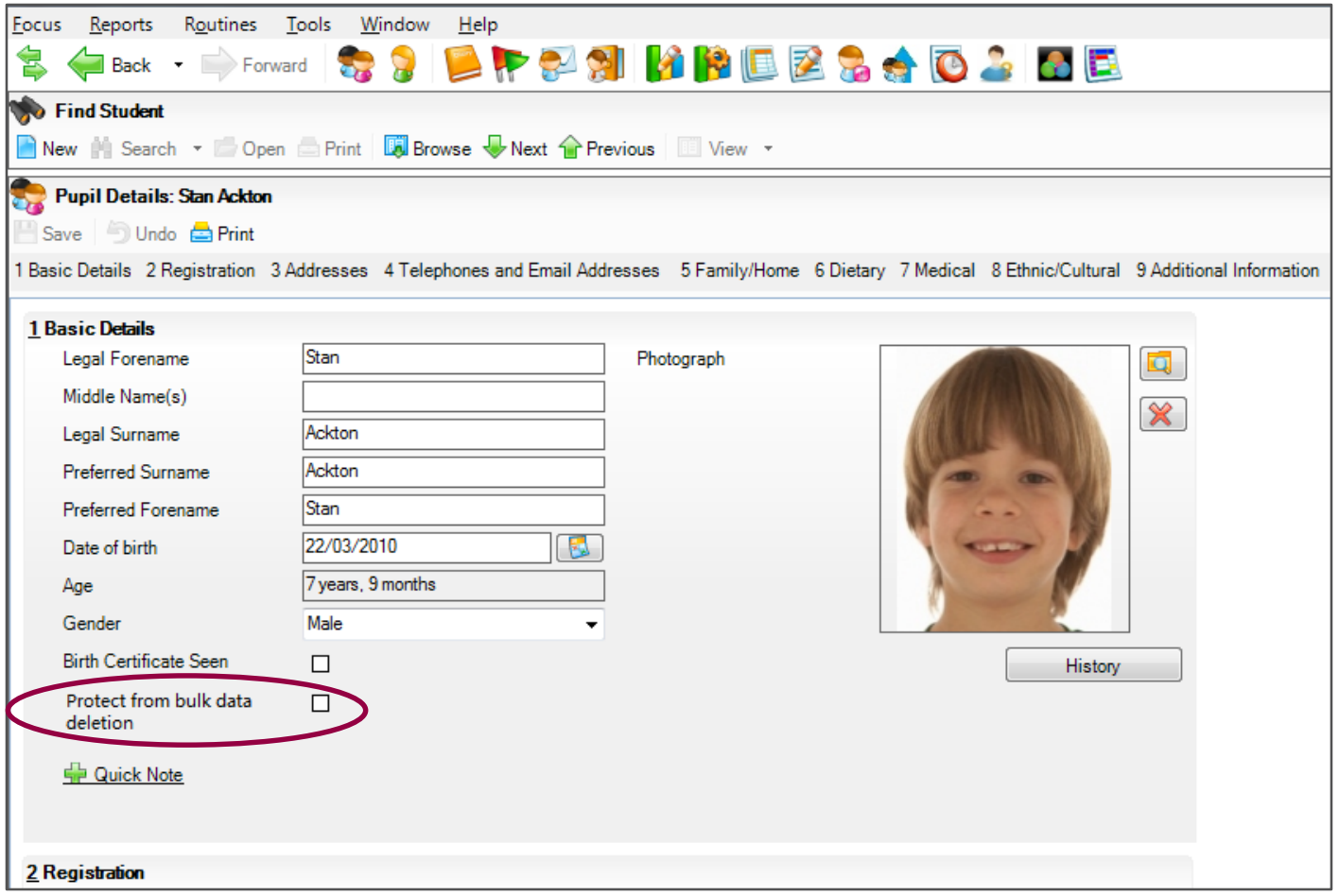
Supporting Data Retention Policies



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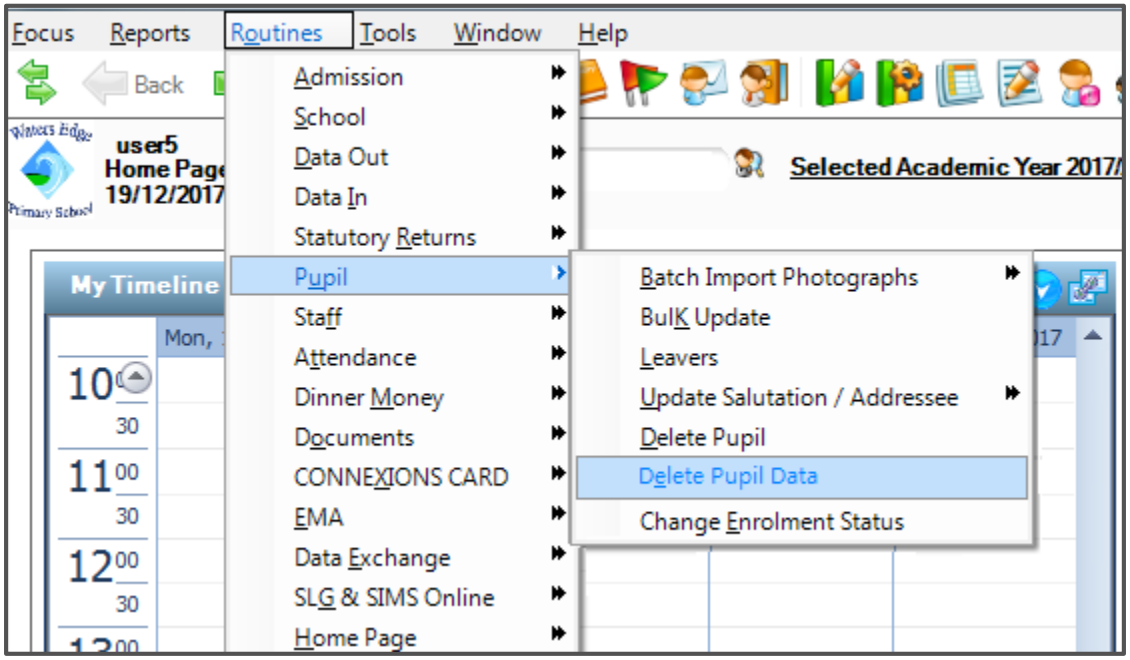

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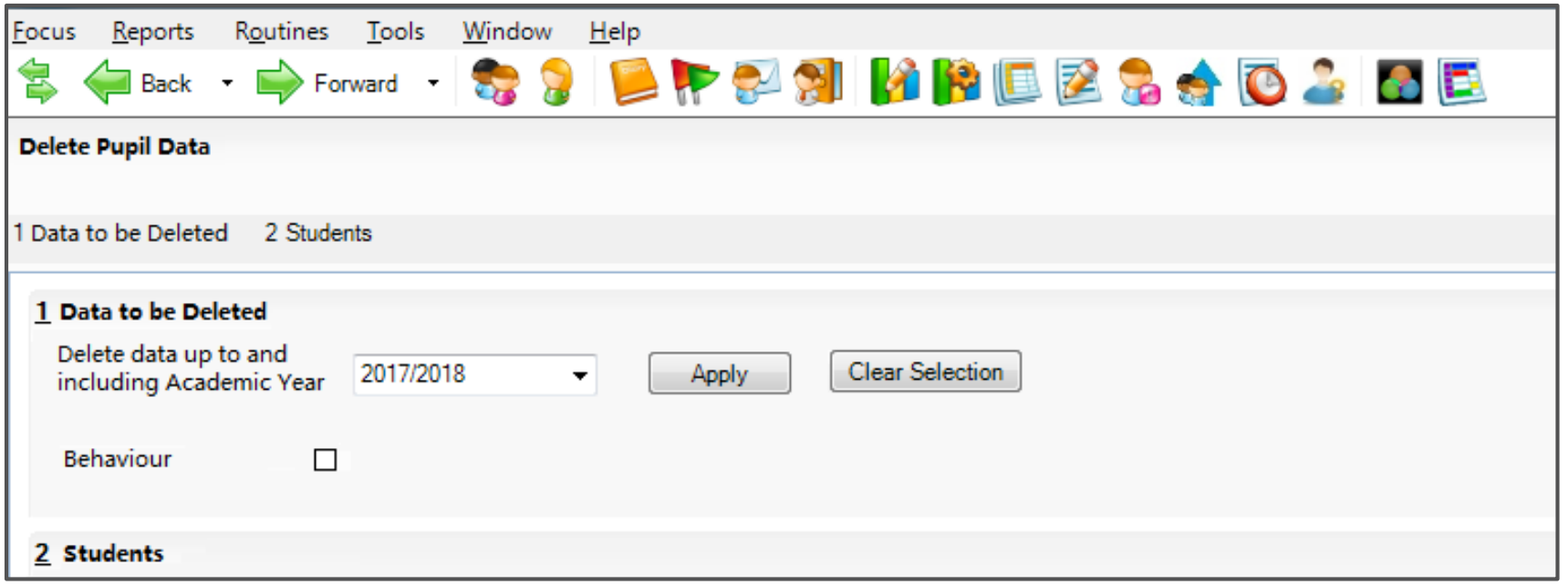
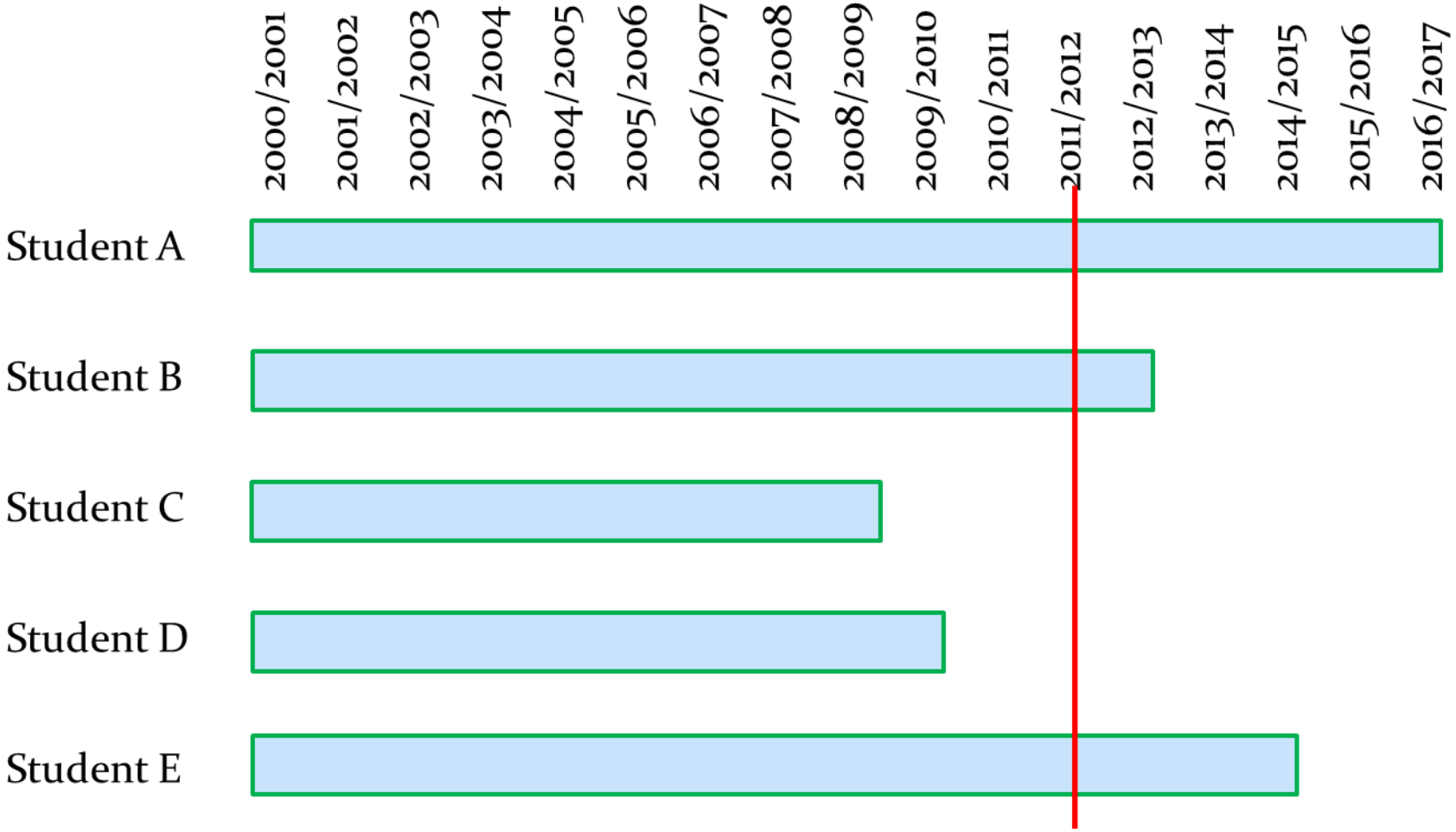


- While this screen shot shows just Behaviour, in deleting a students details there are 16 domains in total.

Supporting Data Retention Policies



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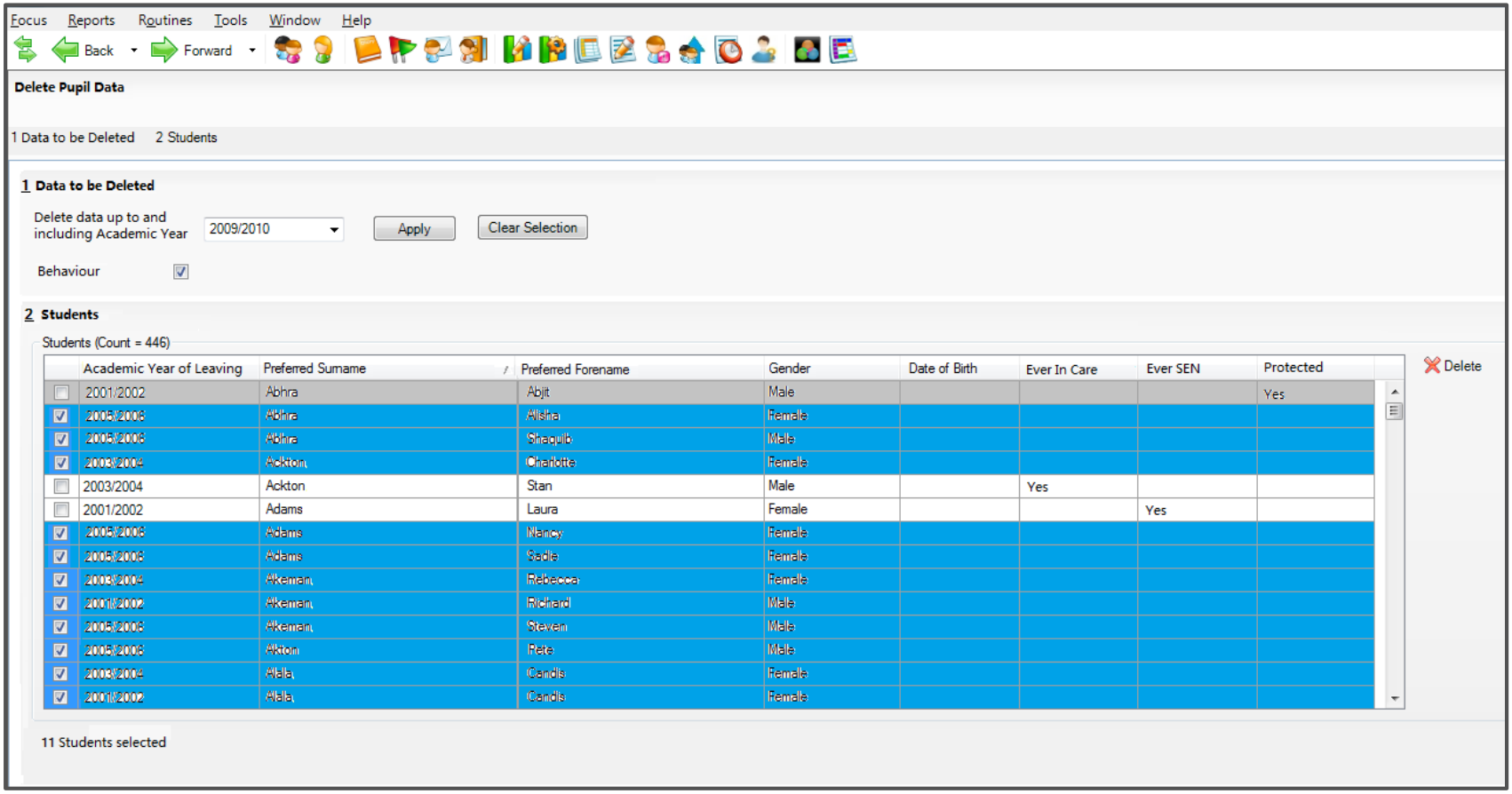
Supporting Data Retention Policies



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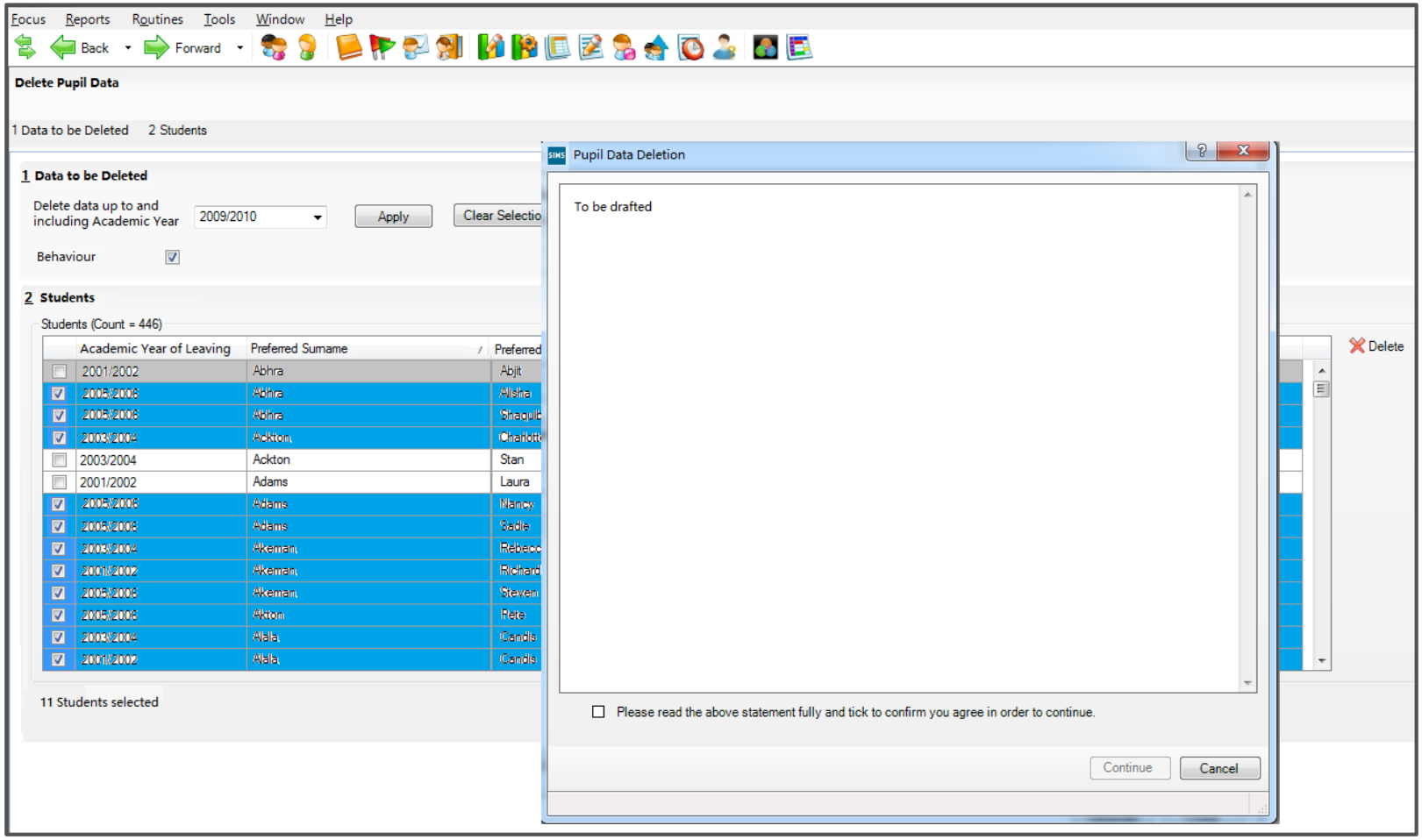
Supporting Data Retention Policies



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SIMS Parent App Lite

Support GDPR: Data Accuracy

Simple and secure, electronic method to view and manage their personal data

Save time

by reducing manual data collection and processing

Save money

by removing the need to print data collection forms

Simple anywhere, anytime access…

on any device, at home or on the go, securely and safely

Secure, electronic solution

to ensure security in transit

Simple approval process

within SIMS without the need for extensive manual data entry

In-built communications

Pro-actively remind parents to update or confirm accuracy

Easy to get started and maintain

Simple install, register and invite your parents to choose their own logon

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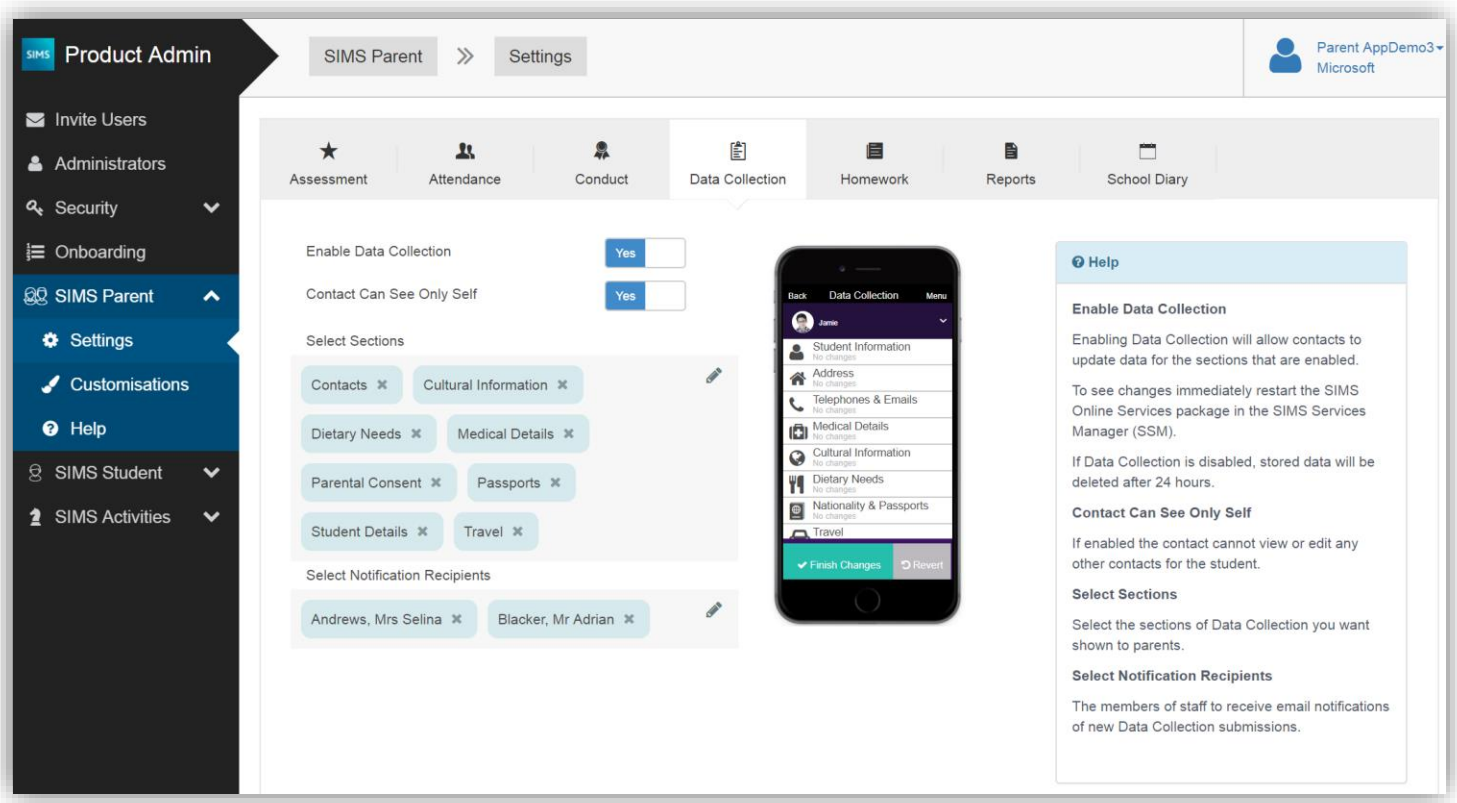
SIMS Parent Lite: Data Collection

- Reduce need for paper data collection sheets and manual entry of data:
- Cost and efficiency savings
- Allowing parents to easily update their children's and own information
- Administrators approve before changes are made in SIMS
- Full audit trail in SIMS of all data collection sheet requests and actions
- Only Contacts with Parental responsibility AND live at same address as student can access the Data collection sheet

Data Collection – Settings and Configuration

Data Collection Configuration – The Administrator can select which areas are available for a parent to modify through the data collection sheet. An additional configuration to hide other contact's info is also available allowing schools to easily manage complex family situations.



Only the data collection feature is available to SIMS Parent Lite customers. Other areas are 'unlocked' when schools upgrade to SIMS Parent.

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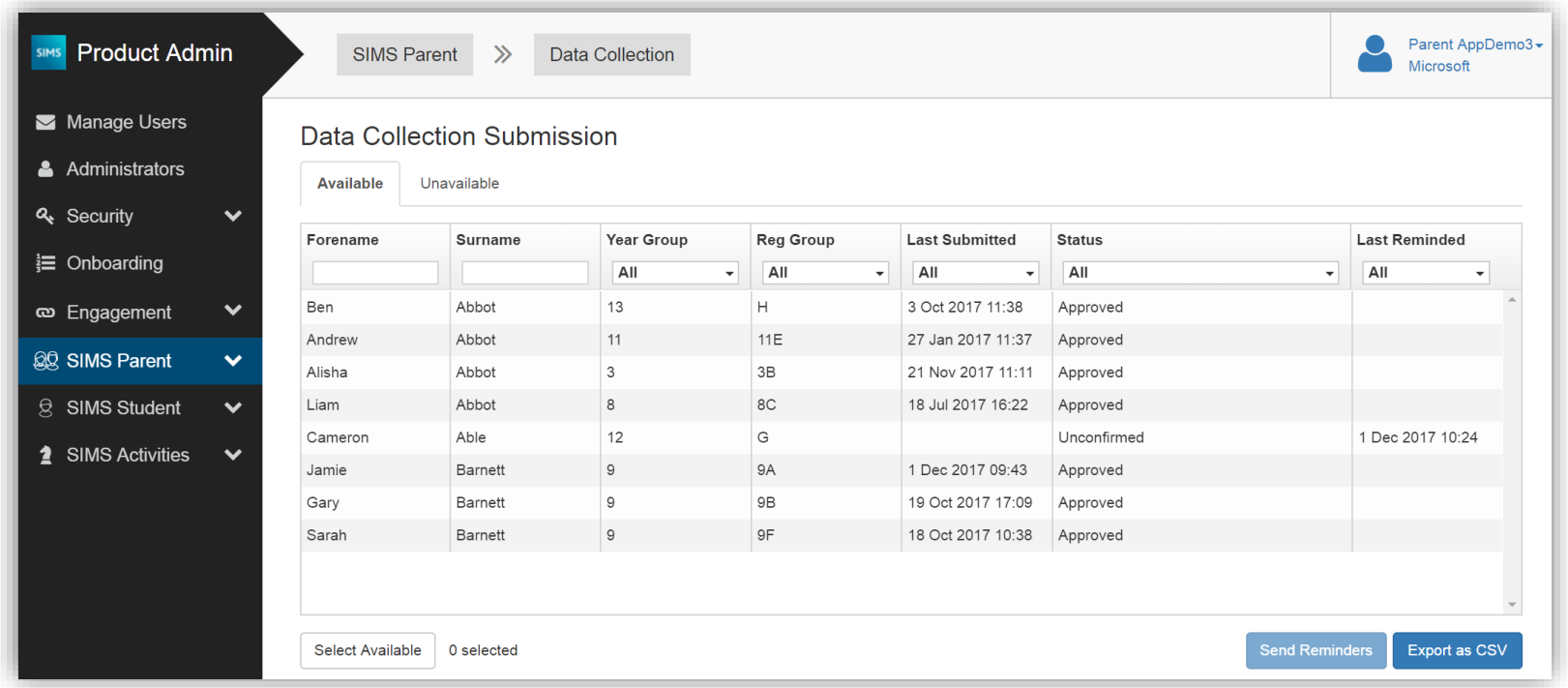
Data Collection – Submission

Data Collection Submission – The Administrator can see a list of parents who have approved their details, whether changes are pending approval, including when the parent last submitted, or if approval is still outstanding. The Administrator is also able to push reminder notifications to specific parents.



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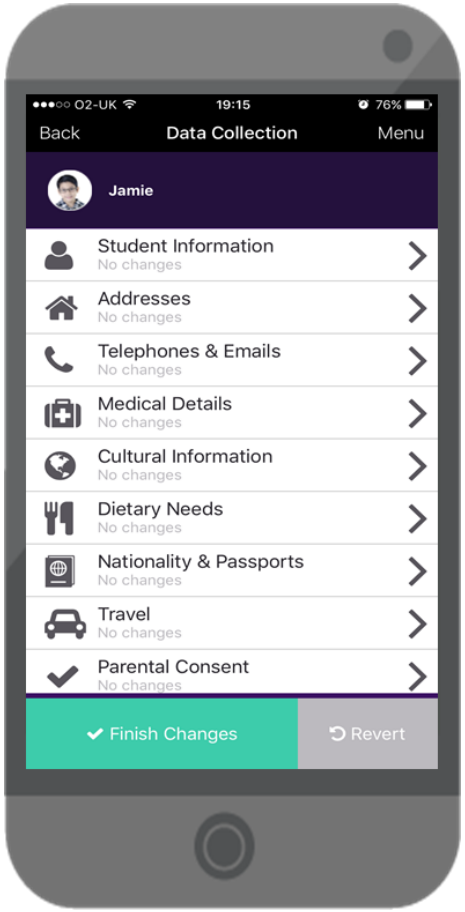
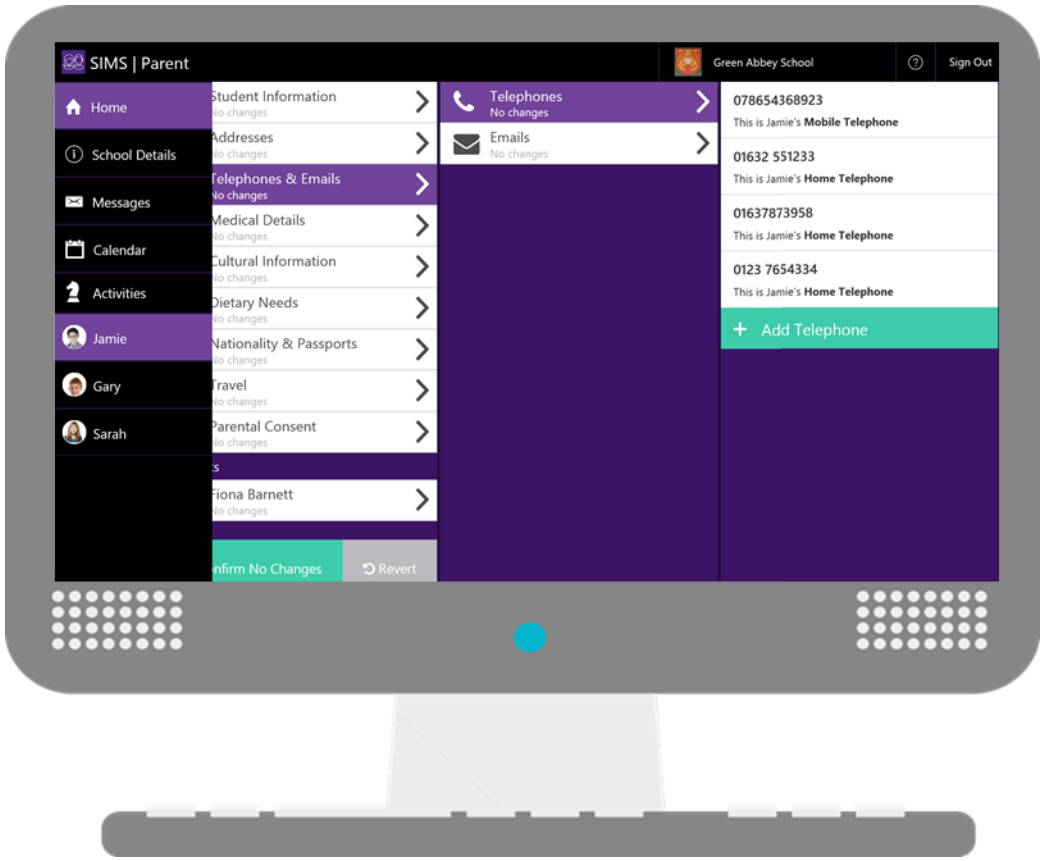
SIMS Parent Lite App and website





Parents can also access School Contact information and Term Dates from the app and website.

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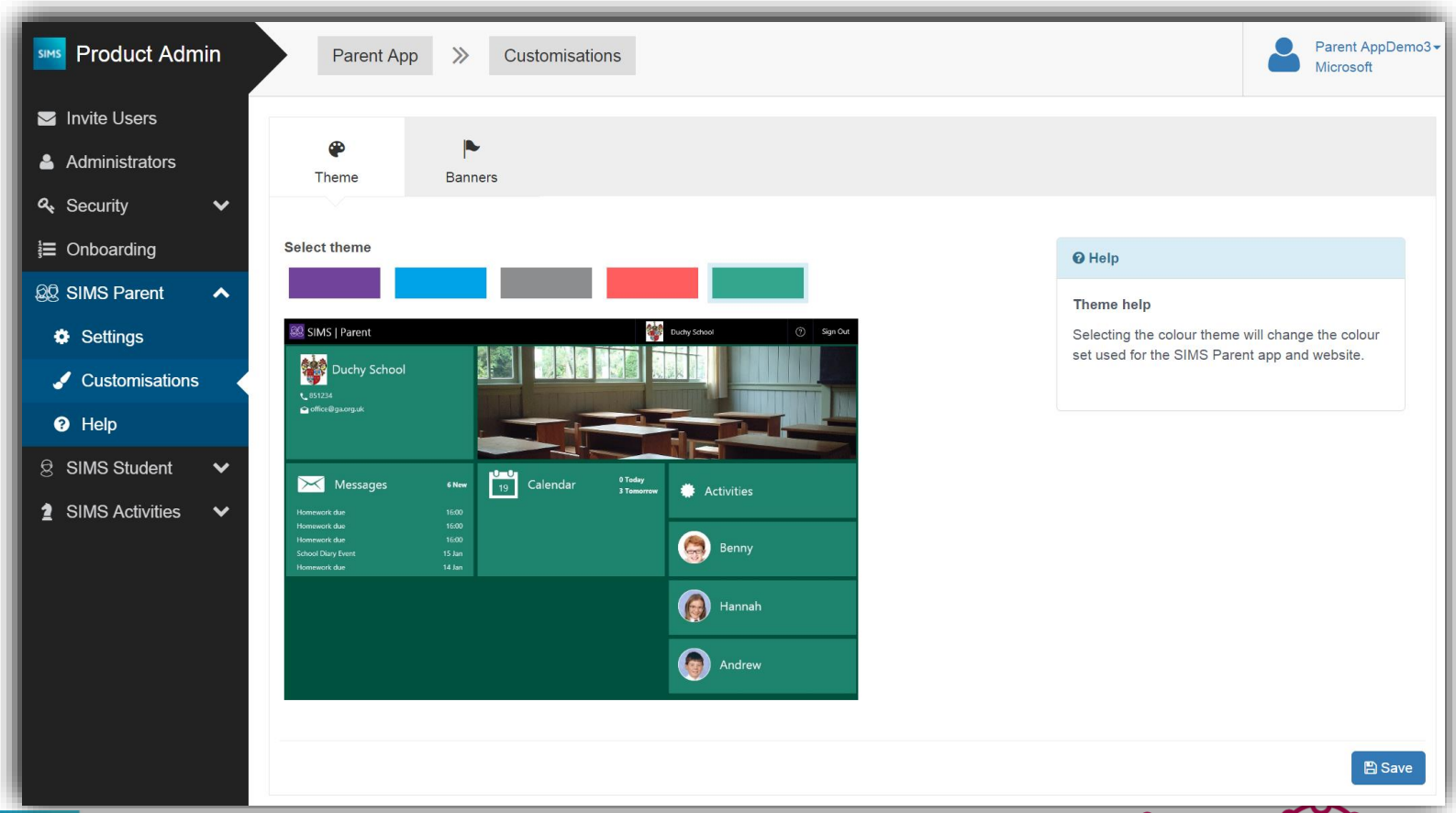
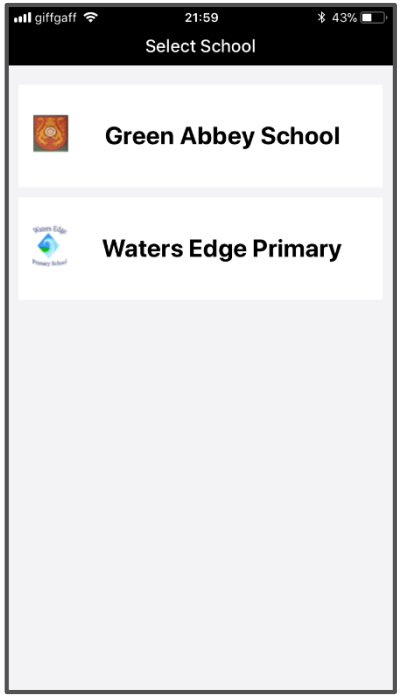
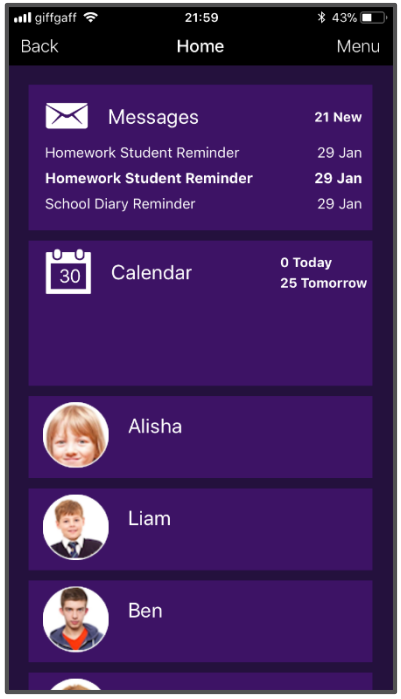
Admin Portal – Customisation

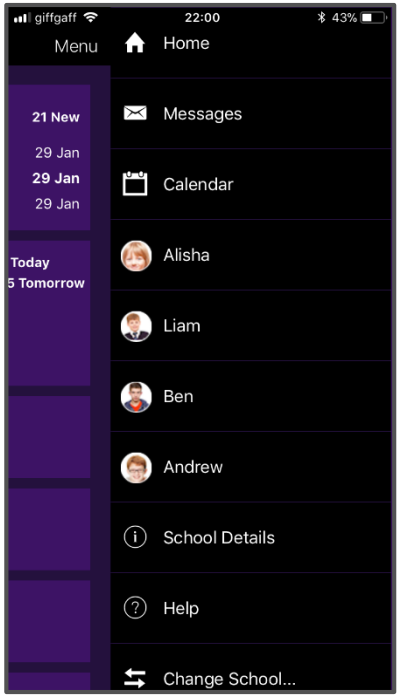
Customisation – Under the customisation area, the school can modify the colour of the site and the Apps. There are 5 colours to choose from.

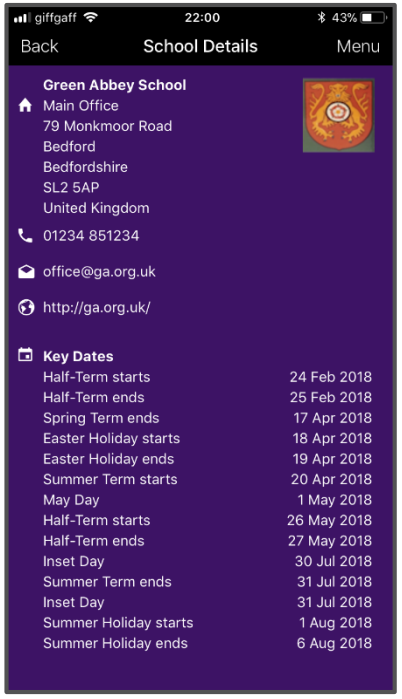


SIMS Parent Lite App and website









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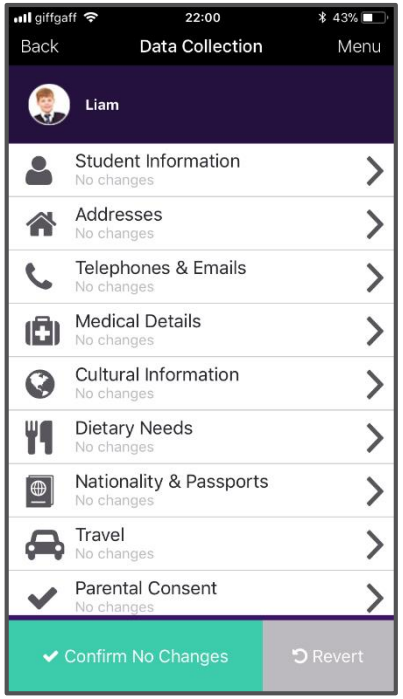

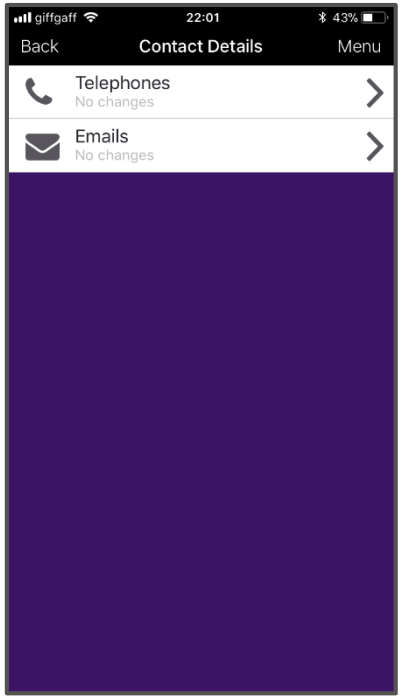

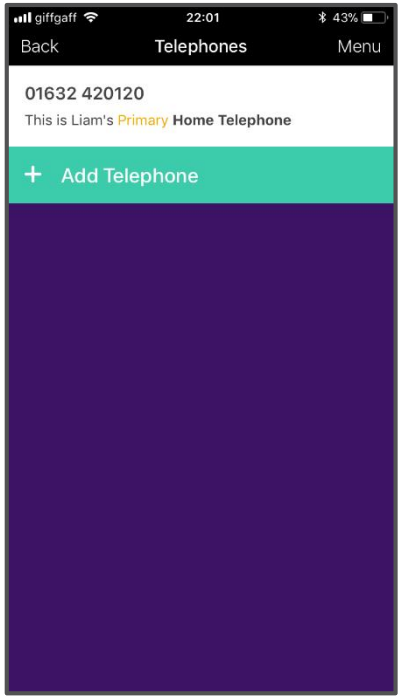

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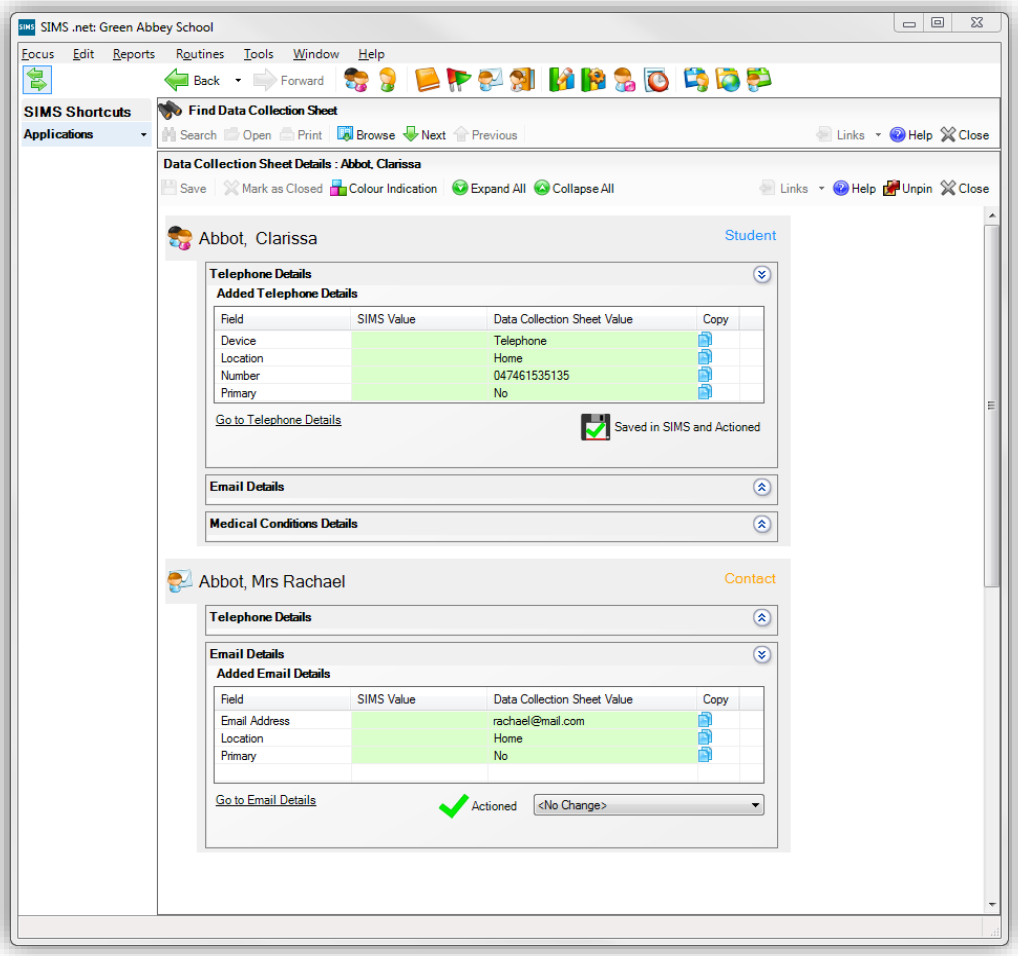
SIMS Administrator – Approving Changes

The SIMS Data Collection Routine provides Administrators with a view of changes Parents have made that need approving.



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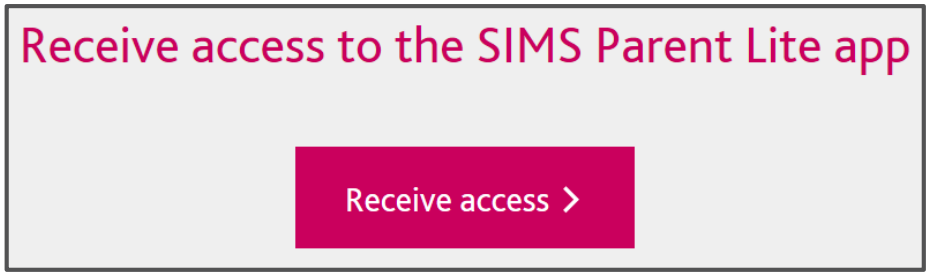
For more information on Parent Lite app…

Visit our website to find out more at

www.capita-sims.co.uk/parentlite



@CapitaSIMS

For more information on GDPR…

Useful Blogs on the Capita Website

www.capita-sims.co.uk/resources/blog/gdpr-what-schools-need-to-know-2018

https://www.capita-sims.co.uk/resources/blog/helping-you-gear-up-for-gdpr

Useful pages on Capita MyAccount

https://myaccount.capita-cs.co.uk/hot-topics/sims-gdpr/

@CapitaSIMS

Questions and Answers

Q - Is the SIMS database encrypted? if not does it a requirement to encrypt?

A - This is difficult for me to answer as GDPR does not state this specifically, the ICO (link) state:

The GDPR requires personal data to be processed in a manner that ensures its security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. It requires that appropriate technical or organisational measures are used.

It would be the schools Data Protection Officer to decide if they feel the SQL database itself needs encryption.

Q - We would not want parents to access this all the time (Parent Lite app), can we send this out at a set time of the year as a link with their sign in details? If you could how would it work. Also how does it deal with split parents? Can they see each others details?

A - Parents can access this at their convenience once they have registered. The school can decide to which group of parents they send a registration link and when they decide to do this. The login details for Parent Lite app are federated to identity providers such as Google, Microsoft, Facebook, Office 365, SIMS ID or other email addresses. Schools **do not** manage parents usernames or passwords. Only Contacts with Parental responsibility **AND** live at same address as student can access the Data collection sheet.

Q - Where you say SIMS Lite - is this the same as SIMS Parent?

A - Yes, SIMS Parent Lite app is the same application as SIMS Parent **but only** with the Data Collection Sheet functionality. SIMS Parent Lite app is part of your annual SIMS maintenance and therefore you already pay for the Lite version so there is no additional cost for installation.

Questions and Answers

Q - Is there a cost to Parent App Lite?

A - If you are a SIMS customer and pay the annual maintenance, then SIMS Parent Lite app is bundled with that.

Q - Can parent lite communicate with pre-admission groups so that they can update their data before coming on roll?

A – Not yet, we are considering a status of accepted applicant in a future release.

Q - sorry may have missed this - can you define the start date of when you want the data from? or will it always get anything from as far back as records exist?

A - You can set a date for the domain of data you want to delete, but it will be at an academic year level, i.e. for students who are a leaver in the academic year 2011/2012 or before, delete all their conduct data.

Q - Why is the output not in PDF which is less easily edited? (and the general norm for read-only docs shared outside the school).

A - The output has to be in a form that can be edited because the school need to review the data and have the option to redact anything which may cause safeguarding issues for the subject.

Q - We have the Parent App full version. we are trying to use the data collection form for our pre admissions however we can't get the parent data to show through. We can see the Pre admission Group and the child but the parent contact info will not show through or we can invite them to join the APP. This is an ongoing problem.

A - We are considering a status of accepted applicant in a future release.

Questions and Answers

Q - Thank you for your time, has given me a good insight, i will follow your hot topic page

A - You're welcome, glad there was some information of interest.

Q - Is the new naming choices available in student list reports as well the reporting engine?

A - No.

Q - For personal data output students - does the report include the linked documents or do these have to be printed individually?

A - The PDO report lists the names of the linked documents and their properties. It does not print or output them, for some schools this could be many, many pages. If a subject, after reading the PDO and all the other data from other systems and filing cabinets wants copies of the linked documents, then the school can ask them to refine their choice, i.e. Which School Report do you want, or what letter type. If there is significant feedback from users that we need a way to extract the files more efficiently, then we can review this against all the other GDPR and statutory work we need to achieve.

Q - Can we add additional questions into the data collection sheet on the parent app lite at a school level?

A - No, the only item you can add to are consent types.

Q - If you want someone to be able to run a personnel data output report but not a student one, what permissions are required to achieve this?

A – For contact PDO you just need the Data Protection Officer, but to run this for a member of staff, you need Personnel Office **in addition** to Data Protection Officer.

Questions and Answers

Q - right to rectification - with the bulk deletion, will there still be a record of the student attending the school?

A – As you are deleting data in sections, you can choose to leave the core basic record in place, but if you choose to delete this and therefore all the student data, then there will be no record. If you can exercise a legal and legitimate use for retaining the data, then you are in line with DPA and GDPR.

Q - Is there anywhere where we can ask parents GDPR questions i.e. if they would opt in to certain emails etc.?

A – You can use the consent area of a student record, you can set up user defined fields in the contact record or you can simply say that communicating by email is the way the school runs it's communication processes and as a parent by giving your email we will use this for communications. If they do not want to be communicated to via email, ask for the email address to be removed.

Q - What if a staff member is a previous student?

A – They will have two roles, run the PDO for each role.

Q - What about special schools - all students have SEN (in relation to Deleting Student Data)

A – Good point, I will raise this with the development team and see if we can do something

Q - Would be useful to be able to import the staff PDO XML into another SIMS system when staff change schools, effectively a staff CTF.

A – We have considered this, but found too many school specific details and the feeling from a pilot discussion with customers felt that much of the data was best left behind to help with only holding data which you have a lawful and legitimate reason to do, so would individual absences from School A be relevant to School B…?

Questions and Answers

Q - Can consent be collected via the ParentLite App? If so can you add multiple consent questions? could SIMS build in comment consent questions that schools could tweak?

A – Yes, any consent field in the Parent Lite app can be presented to the parent to opt in or out of. Any additional functionality here is currently not in scope.

Q - How will SIMS comply with the right to erasure by 25th May?

A – Schools can already delete data in SIMS at the moment, so we are GDPR compliant, it's just that we don't make it easy to do it quickly or efficiently. My mission is to make deleting the data more user friendly and more efficient. That is what we will achieve in the Summer Release for Student and other areas like staff later on in 2018.

Q - I do not seem to have the Person Data Output option available to me. How can we add this?

A – This was in the Autumn Upgrade and you must be a member of the Data Protection Officer permission group in System Manager.

Q - If we send an email with data to the wrong internal member of staff do we inform the ICO?

A – I am not a legal expert and therefore cannot advise you on this scenario, but slide 12 defines what a data breach is. I would read the ICO further guidance on the matter: https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/

Q - Why was the xml output not available for the 'contact' - only Word seemed to be an option

A – Development time for the Spring ran out, and to be honest how useful would it be. Basic contact information is already transferred from school to school in a CTF. If there is a genuine demand for this, then later in the year we can explore this.

Questions and Answers

Q - How would this work with hosted SIMS - location not working..

A – Not sure I understand your question, if it is relation to the location when selecting the PDO save location, they will be a secure location for Census files. I suggest you discuss this with the Service Desk.

Q - Who can be a DPO? and what qualification do they need?

A – Wow, not sure I have answer this specifically, but the ICO give advice here:

https://ico.org.uk/for-organisations/local-government/local-gov-gdpr-faqs/

https://www.gdpr.school/who-will-be-your-schools-dpo/

Q - have the new data fields in the reporting affected current reports. will they still work

A – I specifically asked that current reports that have name fields are not broken. The new fields are in addition, we did not change any existing fields.

Q - Does the data export for staff include any information from the Performance Management module?

A – Yes

Q - Can we use this for students awaiting admission - save on paper forms for new families

A - Accepted pre-admission students are currently not available for update in the Parent Lite app, this will be considered in a future release.

Q - Parent Lite, we have devised our own version of a Data Collection form, can this be issued to Parent App Lite users?

A – No, sorry.

Questions and Answers

Q - Who will provide customer support for the parent lite app?

A – Your SIMS Support Unit

Q - Does the deletion process for staff also work in the same way?

A – I hope so, we need to evaluate and investigate if this is possible, staff are linked in many intricate ways and deleting them may be like pulling the table cloth off a table with your best wine glasses on the top, we need to make sure the wine glasses don't come crashing down.

Q - Can you provide a guide for parents to sign up/use the app

A – There are suitable notes available if needed, but it's as simple as clicking on the registration link in the email they get to their email address.

Q - Hi there, I have waited for support and still not had any and as I can not see anything other than a Black Screen. If you are able to confirm if you are holding any other webinars in the near future so I can try again that would be helpful. My colleague has watched this earlier today and not sure why I can not see it!

A – We had over 200 people on the Webinar this afternoon who did not have issues, I am sorry you did. A video of the session was taken and this will be sent out as a link later next week.

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