

# SIMS Options Online Privacy Statement

We take care to protect the privacy of customers and users of Capita websites and Products. Set out below is an explanation of how we process and manage the information.

## 1. Introduction

Capita Education Software Services are fully committed to keeping your information safe.

This privacy notice is to help you understand what information Capita Education Software Services collects, the purpose for which it is collected and who we share the information with. It also explains the decisions that you can make about your information.

This notice will provide you with the following information:

- Accountability
- Who is collecting information about me?
- What information is transferred?
- Why are you collecting this information?
- What is the legal basis for processing the information?
- Can a Parent request data to not be displayed within SIMS Parent?
- Where the data is stored?
- Security of the data stored
- Where the data is processed
- What information from sign in providers does Capita receive and store?
- Is the information received from Third party providers used outside of the sign-in process?
- What information do sign-in providers receive from Capita?
- Is there any additional Third Party processing of SIMS data?
- Cookies Policy

For the purposes of this Privacy Notice:

“Information” means either the data held within SIMS application or the School and contact contractual and support information, this will be specified where referred to.

“ESS” means Capita Education Software Services.

“Customer” means the establishment that purchases the service. i.e. individual school, Multi Academy Trust

“Data Controller” refers to the Customer

“Data Processor” refers to ESS

“Data Subject” refers to a living person details that are recorded in the SIMS application by the Data Controller

“Individual” refers to a person or employee who is associated with a named Customer

“EEA” is the European Economic Area

## 2. Accountability

ESS provides you, the customer with the SIMS Options Online service that enables you to share selected information with students and parents. The purpose of Options Online is to display information relating to the course (subject) choices typically made at age 14 and age 16 to the student and parent and to allow the student to make their course choices according to individual school policy.

As you are responsible for the information that is entered and maintained in the Options Online service, this makes you, the customer, the Data Controller. ESS delivers the service that provides you with the ability to store this information and as such does not enter your information into this system for you, this makes ESS the Data Processor. As a Data Processor, ESS provide a hosted service that includes the application and customer data as well as support services to the customer.

As the Data Controller you are responsible for the information in the Options Online system and must be able to demonstrate compliance with the 8 Principles of the Data Protection Act for the processing of personal information.

ESS must demonstrate the same compliancy for any processing of your SIMS Data and School and school contact information.

*Details of the 8 Principles are detailed on the Information Commissioner Office’s website: <https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>*

### 3. Who is collecting information about me?

Capita Education Software Services  
Franklin Court  
Priory Business Park  
Cardington  
Bedfordshire  
MK44 3JZ  
01234 838080

Website : [www.capita-sims.co.uk](http://www.capita-sims.co.uk)

Should you have any queries relating to the collection of your information or about this policy please contact the Capita Data Privacy Officer at [privacy@capita.co.uk](mailto:privacy@capita.co.uk)

### 4. What information is transferred?

Options Online depends on data that is held within the SIMS system. Selected information is transferred from SIMS to Options Online periodically, via the SIMS Online Services Client over a secure channel. The SIMS Online Services Client (school-side) uses client credentials to uniquely identify the school and authorise at the server.

Data is transferred from the following areas, full details of the fields transferred with examples are listed in Appendix 1

- Courses
- Contacts
- Year
- Medical
- Parent
- School
- Student Parent
- Students
- Teacher

### 5. Why are you collecting the information?

Designed with input from schools, SIMS Options Online enables school administrators to tailor course choices for their students, for students to select their choices online and for administrators to process the choices to give the best satisfaction rate prior to scheduling.

The above data is extracted for the purpose of set up, selection and processing of the course choices.

### 6. What is the legal basis for extracting and processing this information?

The contract entered into by the School and Capita allows Capita to extract the data in the above table for the purposes of displaying this information to the students and parents.

### 7. Can a Parent request data to not be displayed within SIMS Parent?

Yes, this is managed by the school. Parents could opt out, in which case the school would deny access in the administration page of the system

### 8. Where the data is stored?

Data is stored within Options Online in various forms, all using Microsoft Azure data constructs. Information interchange between software services within the applications is protected by a dedicated Secure Token Server (STS), so that access to all data is validated against the access rights of the requesting user.

Data sits with the EEA and is subject to EU model clauses, specifically data for these services reside in the EU: Ireland and the Netherlands.

### 9. Security of the data stored

Options Online is a securely hosted web service, delivered via the web using standard HTTPS TCP/IP protocols. The Options Online application is hosted on a secure and highly scalable managed service, with the main system hosting provided by Microsoft Azure® UK, which is reliable and resilient. Microsoft Windows Azure has G-Cloud Impact Level 2 (IL2) from the Cabinet Office for use across the UK Public Sector. All data is securely stored and processed within the EU and complies with UK data protection standards and requirements.

Technical hosting and management for Options Online is undertaken fully by Capita on behalf of the establishment, including the provision of all software, maintenance operations, upgrades and background supporting processes. Application security is 256bit Secure Socket Layer (SSL), point-to-point encryption.

#### 10. Where the data is processed

The Options Online application is hosted on a secure and highly scalable managed service, with the main system hosting provided by Microsoft Azure® UK, which is reliable and resilient. Microsoft Windows Azure has G-Cloud Impact Level 2 (IL2) from the Cabinet Office for use across the UK Public Sector. All data is securely stored and processed within the EU and complies with UK data protection standards and requirements.

#### 11. What information from sign in providers does Capita receive and store?

When a student or parent user logs into the service using a third-party login via SIMS ID they are prompted with a consent screen where they consent for their e-mail address and name to be passed to SIMS ID.

The e-mail address and name are passed to SIMS ID but no extended properties are received other than a unique identifier. The third-party identity provider has no concept of the education establishments that the user is associated with however, SIMS ID understands the site context, as does Options Online.

In the SIMS ID Database we store the e-mail address, a unique identifier which may or may not be the same as their mail address or may be GUIDS (Global Unique Identity that cannot be moved between services), the third-party provider detail may include the student or parents' provided name, this is not stored – SIMS ID stores a name associated with the student or parent from Options Online (sims people service)

#### 12. Is the information received from Third party providers used outside of the sign-in process?

This information is used to associate the third-party account with the SIMS ID identity that is used to authenticate the user to Options Online. The name from Options Online is displayed to help in identifying correct sign in by the end user.

We do not store the email address provided by the third-party login provider, we do however store the email address provided from student or parent during the initial invite process for audit purposes.

#### 13. What information do sign-in providers receive from Capita?

No data is passed from Capita to the sign in provider. We do not send credential information to the third-party provider. The information those service providers have already is freely given and agreed to at the point the user creates an account with the third party and accept the T&Cs of the provider.

#### 14. Is there any additional Third Party processing of SIMS data?

No

#### 15. Cookies Policy

Options Online uses a small number of cookies to provide the features in the web site and to help us improve its performance.

If you do not know what cookies are, or how to control or delete them, then we recommend you visit <http://www.aboutcookies.org> for detailed guidance.

The list below describe the cookies we use on this site and what we use them for:

Cookie Name	Purpose
ai_authUser	This helps us to proactively analyse the performance of the site and its infrastructure
ai_session	This helps us to proactively analyse the performance of the site and its infrastructure

<b>Cookie Name</b>	<b>Purpose</b>
ai_user	This helps us to proactively analyse the performance of the site and its infrastructure
angular-consent.global	Used to track if cookies have been accepted

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 21/12/2017

**Appendix 1 Details and examples of data transferred from SIMS for use by SIMS Options Online**

Area	Field	Example
Courses	BaseGroupld	4454
	Code	Bs/BTCe2
	Shortname	Bs/BTCe2
	Description	Business Studies (BTCe2)
	SubjectCode	Bs
	SubjectName	Business Studies
	Level	BTEC Certificate Level 2
	QAN/	
	Status	Inactive
	Contacts	Contactld
Studentld		A925C7EB-86BC-40D7-91FD-F3FCBF6A2F2B
Title		Mrs
Forename		Hilda
Surname		Abbess
RelationType		Mother
ParentalResponsibility		0
Year	Name	10
	Description	Year 10
	IsActive	1
Medical	Studentld	A1CBE6CF-34E3-47CB-95FB-0BD29BAF6F32
	MedicalCondition	Eczema
Parent	Title	Mr
	Forename	David
	Surname	Abbey
	PhoneNumber	16325564564
School	SchoolNumber	7563
	SchoolName	Options Preview School 2
	SchoolSifRefld	DE8114A4-0771-442C-91DF-7B9419309BC5
	IsIndependent	0
Student Parent	Studentld	DFE97D8C-0CEE-4CE6-9CFF-F84F0CCDBE15
	StudentSurname	Atkinson
	StudentForename	Bridget
	Parentld	75EAD346-2DBA-4CF7-85DB-0018FEA0AB21
Students	Forename	GrahamPreview2
	ChosenForename	GrahamPreview2
	Surname	AbbessPreview2
	LegalSurname	AbbessPreview2
	DateOfBirth	2002-09-29T00:00:00
	Gender	M
	IsSen	0
	AdmissionNumber	4504
	EnrolmentMode	Main
	IsEal	0
	Ethnicity	White - English
	Email	graham.abbess@example.com
	CurrentHouseld	2D8B7BB7-11D2-4E11-A1E8-00058DC46EDA
	CurrentHouse	Newton
CurrentYearGroupld	B39A92F4-DABF-46A3-A281-89615DE315CE	

	CurrentYearGroup	9
	CurrentRegGroupId	2F39C230-078A-4AB7-B5EE-5B3A32083F0E
	CurrentRegGroup	9A
	CurrentNcYearId	B3027EB6-D81B-4FAC-81C1-995DD5BA9E8A
	CurrentNcYear	10
	IsPupilPremium	0
Teacher	Title	Mrs
	Forename	Anita
	Surname	Abell
	Gender	F
	DateOfBirth	1963-02-11T00:00:00
	IsSimsUser	1
	Email	Abell@example.com
	PhotoId	7EF74EE2-21F3-462D-B40F-3F5AE282DA72