



helping
schools
inspire

SIMS Reporting Enhancement supporting GDPR



Best practice



Networking



Learning

Person Data Output (PDO)

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Data Protection Act and General Data Protection Regulation

- The **Data Protection Act** (DPA) ([Principle 6](#)) gives rights to individuals in respect of the personal data that organisations hold about them.
- Part of this right is for an individual to see a record of the information an organisation holds about them, this is commonly referred to as a **Subject Access Request** (SAR).
- The **General Data Protection Regulation** takes some elements of the DPA further, please see the [ICO website](#) for details.



Understanding a Subject Access Request

- A SAR can be for **specific data**, i.e. sessional attendance information for the academic year 2016/2017, or all the behaviour events for the Summer 2017 school term.
- A SAR could also be every piece of information the school holds on that subject.
- **It is not just data held in SIMS** that you need to worry about, what else is stored in your filing cabinets (original paper application forms), in spreadsheets and other documents stored on a network drive.
- Additional notes in a teacher's notepad.



How can SIMS help?

- When a SAR is made by a person it's clear that SIMS cannot and does not legally have to provide a single report to deliver everything.
- It's **absolutely acceptable** under the DPA and GDPR (as confirmed by the ICO) for a SAR to be made up of multiple reports from SIMS.
- The new **Person Data Output** has been developed to make the process for a school easier and quicker when fulfilling the requirements for a SAR.



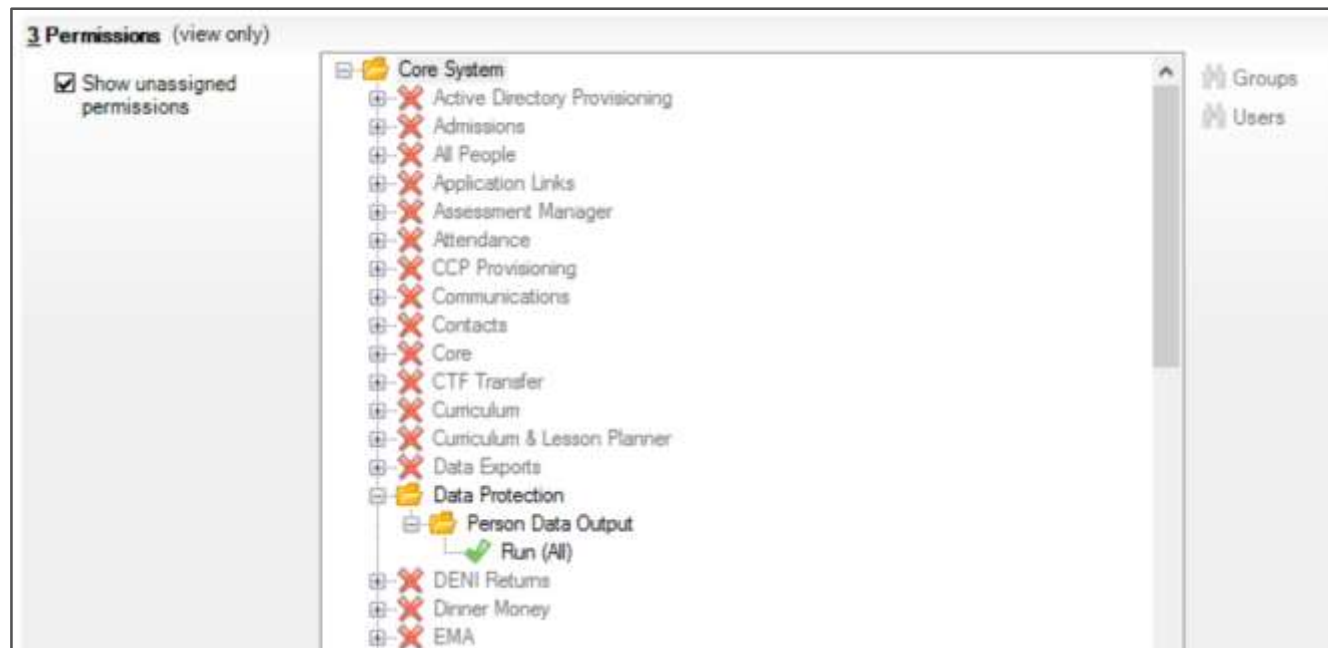
Permissions Required for PDO

- A new permission group called **Data Protection Officer** has been created

Description	Code	Type	Active
Capita Mobile User	CSS:Mobile	Template	Yes
Class Teacher	ClassTeach	Template	Yes
Cover Manager	CoverMan	Template	Yes
Curricular Manager	CurrMan	Template	Yes
Data Protection Officer	DataProt	Template	Yes
Dinner Money Client for Agora	SSM:DMCFA	Template	Yes
Educational Provider	EXT-A	Custom	Yes
Exams Officer	EO:Officer	Template	Yes
Exams Operator	EO:Oper	Template	Yes

Permissions Required for PDO

- By default upon upgrade **no users are added** to this group, **nor is the single permission added** to any other existing group



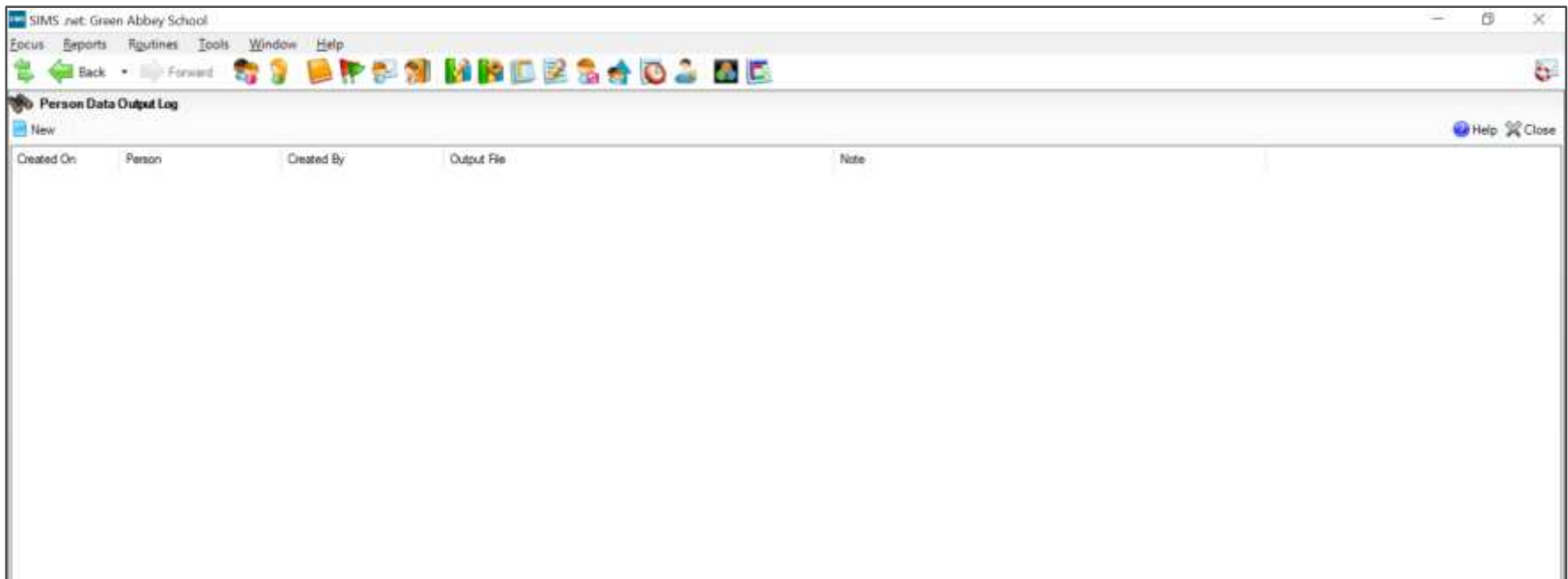
Running the PDO

- As functionality extends in future releases to allow for data portability (**machine readable outputs**), it's was clear that this is going to be more than a report.
- To generate a PDO select **Routines | Data Out | Person Data Output**.
- The screen will show an **audit log** of all **previously generated outputs** detailing when, on whom, created by, original save location and notes collected at the point of creating the file.



Running the PDO

- Click on **New** to generate a new output.



Running the PDO

Person Data Output

Folder Location for Generated File

Location: C:\Users\pfeatherstone\Documents\PDO Extracts

Audit Log Note

PDO requested by Mr K Jones, father of Gregory via email

Basic Details

Surname: Jones, Forename: , Gender: , Date of Birth: , Search

Matched People

Full name	Gender	Roles	Address
Jones, April	Female	Student, Candidate, Applic...	90, Simpson Road, Bletchley, Milton Keynes, MK1 1BA, United King
Jones, Barbara	Female	Student, Candidate, Applic...	8, Dalegarth, Buckden, Skipton, BD23 5JU, United Kingdom
Jones, Bryn	Male	Student, Applicant	12, The Highway, Shortstown, Bedford, MK42 0UR, United Kingdom
Jones, Derek	Male	Student, Candidate, Applic...	51, High Street, Bedford, MK40 1RZ, United Kingdom
Jones, Derren	Male	Student, Candidate, Applic...	58, High Street, New Bradwell, Milton Keynes, MK13 0BP, United K
Jones, Gregory Alan	Male	Student, Applicant	39, Water Lane, Kempston, Bedford, MK42 7BJ, United Kingdom
Jones, Harvey	Male	Student, Applicant	14a, Southville Road, Bedford, MK42 9PS, United Kingdom
Jones, Hayley	Female	Student, Applicant	32, Alder Close, Baldock, SG7 6HN, United Kingdom
Jones, James Brian	Male	Student, Candidate, Applic...	34, Mafeking Road, Cardiff, CF23 5DQ, United Kingdom
Jones, Joe	Male	Student, Applicant	9, Juniper Gardens, Walnut Tree, Milton Keynes, MK7 7LZ, United
Jones, Joe	Male	Student, Applicant	28, Roundmead, Bedford, MK41 9JB, United Kingdom
Jones, Julie	Female	Student, Candidate, Applic...	40, Grange Lane, Bromham, Bedford, MK43 8NR, United Kingdom

Generate Close

The user must select a location to save the PDO file and ensure it is secure and appropriate location.

Suitable notes can be entered here in relation to the PDO.

For this first release Students will be the focus of the search, later releases will allow for the search for Staff, Contacts and more.

Select the person on whom you want the extract the data. Initially the output will contain Student (not applicant) data.

Terms and Conditions for the PDO

SIMS Person Data Output Agreement

Whilst every effort has been taken to provide you with all the information held on the subject, it will be necessary to run additional reports in certain areas to fulfil your Subject Access Request. Examples of these can be found in SIMS 'Setting Up and Administering SIMS' documentation.

As the Data Controller, it is the responsibility of the School's Data Protection Officer to thoroughly review the report output for accuracy and to redact any information they feel could cause Data Protection issues. Useful information on redaction can be found on Page 20 of the following document
<https://ico.org.uk/media/for-organisations/documents/how-to-disclose-information-safely-removing-personal-data-from-information-requests-and-datasets/2013958/how-to-disclose-information-safely.pdf>

CAPITA ESS cannot be held responsible for the information you choose to provide in response to a Subject Access Request, nor for which method the Data Protection Officer chooses to respond to the Subject.

The contents of this report will contain sensitive information which is no longer protected by SIMS permissions. It is your responsibility to ensure its security.

If you have any questions regarding your responsibilities in relation to Subject Access Requests then you are best advised to review the information on the ICO website.
<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-6-rights/subject-access-request/>

Both parties will act in accordance to the terms of the Data Protection Act 1998.

Please read the above statement fully and tick to confirm you agree in order to continue.

Continue Cancel

Guidance for running additional reports.

Check, check and double check the output before returning to the subject.

Useful guidance of redaction.

Data contained in this output can be of an extremely sensitive nature and could cause safeguarding concerns.

Very useful information available on the ICO website.

You cannot run the output until you agree to the terms and conditions.



Summary of the PDO

- Output will open as a **MS Word** (.docx) file.
- Detail such as individual sessional attendance (i.e. each individual mark) is not provided, **but** a summary for each academic year is given.
- Where other areas such as Dinner Money or Fees Billing are used, the PDO provides a **summary of data**.
- In these cases, where SIMS provides comprehensive more detailed reports, i.e. attendance certificates or dinner money transactions, we recommend you **supplement** the PDO with reports already available in SIMS.





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