

# GDPR Compliance Information

## Key questions and answers

### School PUPIL TRACKER Ltd

Rural Enterprise Centre, Vincent Carey Road, Hereford HR2 6FE

#### 1. Is School PUPIL TRACKER Ltd (SPTLtd) and School PUPIL TRACKER Online (SPTO) software compliant with GDPR?

Yes, SPTLtd and SPTO are compliant with the EU GDPR regulation and the UK Data Protection Act.

Documents that form evidence of compliance:

- Privacy Policy
- Terms and Conditions for Purchase
- GDPR Compliance Audit - available in the SET UP HELPER > GDPR section
- Data Safeguarding Policy - available in the SET UP HELPER > GDPR section

#### 2. What consent processes and grounds for processing have SPTLtd in place?

All data stored and processed on behalf of our customers is done so with written consent.

Each school has agreed a contract with us which is bound by the Terms and Conditions for Purchase

[https://secure.schoolpupiltrackeronline.co.uk/schoolpupiltracker/documents/terms\\_and\\_conditions\\_AGREED.pdf](https://secure.schoolpupiltrackeronline.co.uk/schoolpupiltracker/documents/terms_and_conditions_AGREED.pdf)

As part of the Terms and Conditions for Purchase a school gives consent for us to process their data and store their data with UK Fast Limited on servers in Manchester, UK.

#### 3. Where is the 'cloud data' stored?

Our data is hosted on private servers in the UK at a secure facility in Manchester by UK Fast Limited who are fully compliant with and certified by the ISO27001 standard for protected data storage.

<https://www.ukfast.co.uk/data-security.html>

UKFAST Accreditations

- ISO 27001:2013 accredited security solutions
- ISO 9001:2008 certification for internal Quality Management
- PCI DSS Compliant

#### 4. What categories of data are stored?

The data that is stored by schools depends on the information each school chooses to upload or save within their account. Some schools add lots of different types of information for interrogation within SPTO - your school should audit the data that you store in your SPTO account. The minimum data stored by schools and the information on what a Common Transfer File (CTF) can contain can be found in the SET UP HELPER > GDPR section > Content of a CTF

Examples of data schools may store include pupil names, UPNs, ethnicity, assessments etc.

5. What safeguarding and security is in place to ensure SPTO servers are secure?

Our data is hosted in the UK at a secure facility in Manchester by UK Fast Limited who are fully compliant with and certified by the ISO27001 standard for protected data storage.

<https://www.ukfast.co.uk/data-security.html>

UKFAST Accreditations

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Further information on how data is secured can be found in our Data Safeguarding Policy which is available in the SET UP HELPER GDPR section.

6. How long will our data be stored on the School PUPIL TRACKER Online [SPTO] servers?

Each school has agreed a contract with us which is bound by the Terms and Conditions of Purchase and this contract has a start date and an end date. Data is stored on the SPTO servers during this contract period. All your school data will be erased one day after the end date of your contract. Once this data is deleted it cannot be retrieved.

7. How is data destroyed at the end of a licence period?

Data a school has added to their account will be fully erased one day after the end of your contract period. Once this data is deleted it cannot be retrieved. The only records that are not erased are those we are legally bound to maintain, including a list of users, a log of access to SPTO and financial records for our accounting.

8. How can we download our data at the end of a licence period?

We provide a school with a set of tools to easily download the variety of data they have added and stored in their account. This set of tools is available in the SET UP HELPER throughout the term of the contract. Schools are able to download data in readily accepted formats such as Excel or Word. Please remember that data a school has added to their account will be fully erased one day after the end of your contract period.

9. What rights do we have for data deletion?

A school can opt to have their data hosted by us under contract to be deleted at any time.

A request for this erasure should be made in writing to [info@schoolpupiltracker.co.uk](mailto:info@schoolpupiltracker.co.uk)

10. What rights do we have for data access and amendment?

A school has full access to the data hosted by us under contract where they can add, amend and erase data as required. This access is made available through the use of the School PUPIL TRACKER Online application.

**11. Has SPTLtd published a Privacy Notice?**

Yes - this is published as our Privacy Policy which covers how we manage data.

[https://secure.schoolpupiltrackeronline.co.uk/schoolpupiltracker/documents/privacy\\_policy.pdf](https://secure.schoolpupiltrackeronline.co.uk/schoolpupiltracker/documents/privacy_policy.pdf)

**12. What data is shared?**

We do not share the information we store with any other bodies with the exception of financial accounting information which is shared with our accountant team, HMRC and other government department or bodies as required in order for us to fulfil our legal responsibilities. We will only share other information where we are legally required to do so.

Each school agrees in their contract to our use of their pupil official data to create anonymised data for cross-school comparisons. This anonymised data cannot be identified as a particular school and is processed and made available to schools in the National Analysis Tool graphs and tables.

**13. Is data transferred outside the EU?**

No data is transferred or processed outside of the EU.

**14. Is Online Reporting to parents compliant and secured?**

Yes - all the questions and answers above also apply to Online Reporting to parents, parental access and pupil Online Reporting data.