



PS Connect

# PS Connect GDPR

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PS Connect

# PS Connect - Data Protection & GDPR

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## 1. Introduction

- **PS Connect** is currently used by over 2000 schools in over 120 Local Authorities and comply fully with all the corresponding Local Authority Security Standards.
- **PS Connect** has been developed by us in partnership with school staff and leading education professionals. We are an organisation with a strong background in the development and application of software and communications technology to provide solutions in a wide variety of sectors.
- **PS Connect** is a software solution that works in conjunction with a school's existing MIS and registration systems. The externally hosted software uploads data from the school's systems and then facilitates communication with parents/carers using SMS text messaging, in-app messaging, automated voice broadcast, email, mail merged letter and forms.
- **PS Connect** is an official technical partner of Capita, the operators of the predominant school administration system Capita Sims. Our relationship with Capita ensures that the **PS Connect** system is, and will remain, fully compatible with Sims. **PS Connect** has similar relationships with, and is also fully compatible with, Progresso (Advanced), Bromcom, CMIS, and all other major MIS and registration systems.
- **PS Connect** is externally hosted and accessed via an internet connection. **PS Connect** is operated from a secure server operating under a Secure Sockets Layer (SSL) that helps to protect data by using Transport Layer Security to encrypt data. The system also incorporates a rigorous security protocol that restricts access to the logged in area. The system can only be accessed by authorised personnel, via a User Name and Password. In the logged in area of **PS Connect**, schools can choose to have SSL enabled fully or not as we appreciate that some schools will block access completely to websites that use SSL. However, we recommend where possible to use SSL.
- **PS Connect** is registered under the Data Protection Act 1998 (Registration Number: Z9756502) and is fully compliant with the **GDPR**. Strict adherence to the General Data Protection (GDPR) contained therein is integral to our business operations. Data Protection is intrinsic to all our operations and, as such, we ensure that all our procedures are robust and comprehensive. Every possible effort is exerted to maintain data integrity.
- **Results Squared Ltd (as the data processor)** will only act on the customers documented instruction with regard to handling personal data. For more details please see the contract terms and user agreement.
- **PS Connect's named Data Protection Officer is Tim Cropper-Williams (Head of Operations)**

The following guide will answer more specific data protection queries but if you have any more questions please call the Helpdesk team on 0114 2250301

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## 2. Data Access Policy

Due to changes in legislation from September 2012 at the DBS (Disclosure and Barring Service), some of **PS Connect** business activities no longer meet the revised criteria for regulated activity with regard to access to school data and contact with children & young people.

However, roles that involve regular visits to schools still qualify for a DBS check and are carried out where applicable.

These changes to the guidelines are available to view at

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/143666/eligibility-guidance.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/143666/eligibility-guidance.pdf)

- **PS Connect** users are divided into two groups **PS Connect** Employees and **School Users**

### **PS Connect** Employees

- To maintain a consistent approach, employees are given limited access rights (for the **PS Connect** system, and our own recording system) based upon their operational requirements
- Three levels of access rights are used -
  1. **Basic level for general operational use,**
  2. **Intermediate level for escalation**
  3. **Administrator level which has full access to the entire database**
- All access levels are fully logged and monitored regularly - allowing a clear audit trail, and exact usage information
- Each is issued with their own back office system User ID and appropriate password
- Employees use these identities and passwords in keeping with secure practices (passwords are not compromised by sharing)
- Similarly, each uses a secure login and password for the **PS Connect** internal systems and network
- Employees are educated on matters of security and integrity, and the confidentiality of information
- Relevant user IDs and passwords are disabled on leaving the company's employment
- Employees access levels are reviewed on a regularly basis
- All paper-based sensitive information is disposed of by shredding
- Laptops and mobile devices used by members of staff that work outside of the office environment (in schools) are all encrypted. Laptop hard drives are fully encrypted using Bitlocker which uses AES encryption. Smartphones and tablet devices are all password protected and use built in encryption where available.

### **School Users**

- When setting up the school account, the system creates a highly secure password-based user account
- Schools will subsequently set up their own new/additional user accounts
- These accounts can be controlled via the **PS Connect** settings section, where schools can choose the areas of the system to which each school user has access. Access to the Control panel itself can also be restricted
- Users are required to change their passwords regularly, and are reminded to use one that is secure
- Users/schools are blocked after log in failures (tenth attempt) – and are required to telephone the Helpdesk for assistance
- Account users are subject to a telephone security procedure when making enquiries to the **PS Connect** Helpdesk – ensuring that information is only passed to appropriate parties
- School Administrators are responsible for the removal of user accounts after staff leave the school.

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## 3. Key System Specifications

- Web based user interface
- The software is written in php scripting language
- The web based application imports encrypted data from the schools' **Sims or other Management Information** database which is uploaded by a user at the school.
- The system maintains a database containing the following data:

### Student Data & Staff Data

Main Data	Absence Data	Marks Statistical meaning	Achievement Data	Behaviour Data		Other student data			Staff Data	Timetable Data
Admission Number	%Present Marks	Authorised absence	Type	Type	Class	Modes of travel	Ever in Care	Paramedical Support	ID	Class Name
Full name	%Authorised absence	Unauth Absence	Type Code	Location	Subject Name	Route	Eligible for free school transport	Emergency consent	Full Name	Subject Code
Gender	%Unexplained absence	Possible Marks	Subject	Date		SCE Indicator	Free school transport start date	Blood Group	Main Mobile Number	Subject
Ethnicity	%Approved Ed activity	Unexplained absence	Date	Time		Source of Service Children	Free school transport review date	Dietary Preference	Main Home Number	Class Teacher
Reg group	%Present + AEA	Late Before marks	Description	Description		Funded Hours	Scholarship ?	Eligible for FSM?	Home Email	
Year group	%Late Before Reg	Late After marks	Outcome	Outcome		Hours of Setting	Bursary?	Eligible for Free milk	Full Address	
House	%LateAfter Reg	Missing marks	Recorded On	Status		Top-up Funding	FSM ever?	Parental Consent	Postcode	
Telephone	% Late both	Attendnace not required	Recorded By	Recorded On		Uniform Allowance	PP Indicator	Meal arrangements		
Email	Present Marks	Mark	Period	Recorded By		In LEA Care	PP Notes			
Address	Approved Ed activity	Mark Description	Class	Awarded By		Living Arrangements	FTE indicator			
Religion	Present AEA	Mark Date	Subject Name	Period		Travel provided by LEA	Dietary needs			

### Priority 1 Contact Details

Full Name	Full Address
Main Telephone Number	Priority
Home Telephone Number	Parental Responsibility
Mobile Telephone Number	Home Language of the parent
Main Home Email	
Man Work Email	

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## 4. Data Upload Process

Data is uploaded from the school's Management Information System either automatically each night (or once a week), or by a user in the school depending on the type of data. **PS Connect** has a school server side piece of software that securely uploads data from the relevant MIS. Data is uploaded via SSL is stored in an encrypted state on one of our servers housed in a tier 4 data centre provided by Digital Realty. Our data centres have the following certification:

- ISO27001 – Information Security Management
- ISO9001 – Quality Management
- ISO14001 – Environmental Management
- ISO22301 – Business Continuity Management
- OHSAS18001 – Occupational H & S Management
- PCI DSS – Payment Card Industry security standards
- ISO50001 – Energy Management

## 5. Parent Opt-out

- If a parent/carer makes the school aware they do not wish to have their contact details used by **PS Connect** for communication purposes, it is the school's responsibility to change their contact priority number to **9** in your MIS. The school must then inform the **PS Connect** Helpdesk on **0114 225 0301**. Once this is done, **PS Connect** will not receive this data.

## 6. Security and Data Protection

- The **PS Connect** system incorporates a rigorous security protocol allowing access to authorised personnel only, via a **User Name** and **Password**.
- Authorised users are also subject to access restrictions determined by their personal level of security clearance.
- When calling for support, a system user is asked to set up a telephone security phrase that is only visible to the user and the helpdesk agent. This ensures the validity of the caller.
- Each school administrator can set up its own **Access Levels** using a straightforward tick box system, to add or remove access to parts of the system at different security levels.
- As an extra precaution, no pupil or parent/guardian contact details are displayed or accessible within the **PS Connect** system except within the Audit Trail reports.
- The **PS Connect** Reports Manager incorporates several powerful and extremely useful **Audit Trail** reports that can be used to keep track of the messages sent from the system this will allow you to analyse system usage by specific users and ensure the system is not abused.

## 7. Data Holding and Destruction Policy

- **PS Connect** is committed to the protection of data held whilst customers are accessing the system

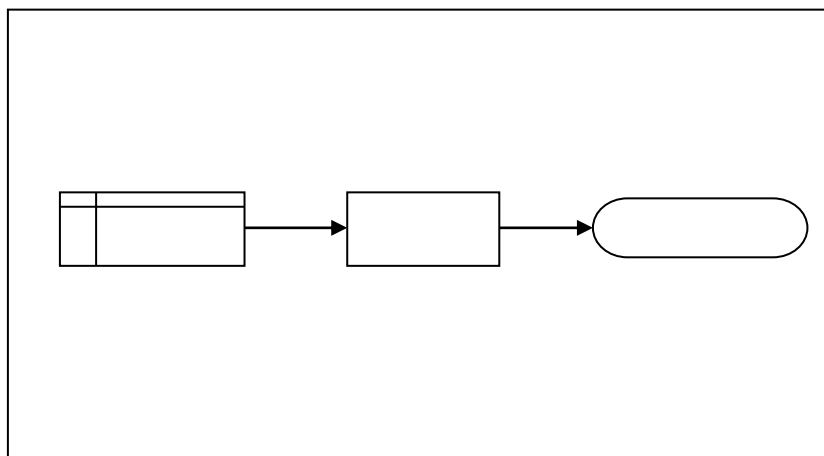
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- If a customer cancels their agreement, their school setup is deleted from the **PS Connect** system, meaning that all personal pupil and staff data is removed. The school is asked to remove all related software from their school systems.
- The Company will retain all messaging history for a 12 month period before it is destroyed, in case of a later need on the school's part to access this information. During the 12 month period, all this data will be retained on secure back-up systems.
- No paper copies of pupil or staff data are held at any time by **PS Connect**. Access is solely via our secure systems for the purposes of guaranteeing Project Partners' full and comprehensive use of the system and to realise our aim of effective, first class customer service.

## 8. SMS Message Sending Process

When a message is sent via the system we store the encrypted message, recipient and originator ID in a database. We then have a script that runs once a minute, which checks the database to look for messages waiting to be sent.

If there are messages to be sent, the message, recipient and originator are taken from the database and decrypted. This information is passed to our SMS gateway software, which runs on the local machine. This information is then transmitted via SMPP\* to one of our SMSC\*\* providers. The provider will pick up the message and deliver it via their normal routes. We are then given back a Message ID, which is later used to track delivery status of the message.



\*SMPP - short message peer-to-peer protocol (SMPP) is a telecommunications industry protocol for exchanging SMS messages between SMS peer entities.

\*\*SMSC – Short Message Service Centre

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## 9. Software Renewal Policy

As we utilize different software applications in our rolled-out products, when new versions of software are released, for security and stability reasons, we carry out research to determine if any of the changes affect components/functions that we use.

If we highlight any changes that are security based and could comprise our software build, we aim to have the software updated as soon as possible. As we use managed servers, these updates are carried out by our hosting company, normally within a 24 hour turn around.

If we highlight any changes that are feature based, that do not affect the day to day running of the system, and we look to roll these updates out at the next development cycle for web updates. These normally occur during school holidays to reduce impact on the end user.

Updates to hardware/operating systems are carried out by our managed server providers as and when required.

## Security Auditing

As Data Protection is of paramount importance to **PS Connect's** operations, regular Security Audits and pen testing of all our systems and processes are carried out regularly by our experienced engineers.

## 10. Subject Access Request and Data Breach Policy

- We are fully committed to support schools with any rights of access requests they have. This may come from a parent, student or member of staff at the school. We will respond to requests without undue delay and within one month of receipt.
- There are specific audit trails in the system to allow the user to export historical contact data from the system.
- We can export and share data, with written consent, in common formats like Excel and Word.

## Data Breaches

- All of our employees have completed training around data protection and how to identify a data breach along with the responsibility to report any breach to our data protection officer.
- If the data breach involves any schools data, we will inform the signatory (or suitably senior official at the school) of the data breach within 8 hours.
- If the breach is reportable under GDPR, it will be reported by our data protection officer (via our data protection management tool) to the ICO within 72 hours.



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## Useful Information

### PS Connect

Suite 4 Albion House  
Savile Street  
Sheffield  
South Yorkshire  
S4 7UD

Data Protection Registration Number – **Z9756502**

Company Registration Number – **5897771**

**If you have a more in-depth query that relates to Data Protection please e-mail our Data Protection Officer at [tim.cropper@psfinancials.com](mailto:tim.cropper@psfinancials.com)**