Contact Group Data protection and GDPR statement

Truancy Call Ltd, Trading as The Contact Group, is a wholly owned subsidiary of IRIS Software Group

Please refer to www.iris.co.uk

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1. Introduction

Contact Group operates products used by over 2000 educational establisgments in over 120 Local Authorities and comply fully with all the corresponding Local Authority Security Standards.

Contact Group is a leading provider of best in class communication and data services in the education sector, working with around 3,000 education establishments in the UK. Our range of solutions cover mass messaging, online payments, personalised schools app, attendance management, anti-bullying system and Looked-after Children. We are a company incorporated in England and Wales under Company Number 4125665.

We integrate with all leading School Management Systems: Capita SIMS, Advanced Progresso, RM Integris, Bromcom, Scholar Pack and others. We are an accredited technical partner of Capita SIMS and have similar arrangements with other providers.

We take privacy seriously and it is a concern of any development of our products. Our products such as Call Parents, Truancy Call, Our Schools App, Tell By Text and Looked After Call are hosted in UK based data centres and are accessed via secure internet connections. Our products are delivered using secure servers operating Secure Sockets Layer (SSL) encryption, using SSL protects data by using Transport Layer Security that encrypts data as it passes between the user and our products. Please contact our support if there are any issues accessing the Contact Group services (support@the-contactgroup.com).

The Contact Group is registered under the Data Protection Act 1998 (Registration Number: Z7911829)

Data Protection is intrinsic to all our operations and, we ensure that all our procedures are robust and comprehensive. We have staff who are hold General Data Protection (GDPR) accreditations to ensure that our operations meet compliance.

IRIS Software Groups named Data Protection Officer is Vincenzo Ardilio. If you have any queries and wish to contact our DPO please use dpo@the-contactgroup.com

2. Data Processor or Data Controller

In terms of the services and products we provide we are instructed and authorised to provide data processing.

Product	Data Controller	Data Processor(s)
Call Parents	Educational Establishment	Contact Group, Messaging Providers, Management Information Systems
Truancy Call	Educational Establishments	Contact Group, Messaging Providers, Management Information Systems
Our Schools App	Educational Establishments	Contact Group, Messaging Providers, Management Information Systems

Looked After Call	Local Education Authority	Contact Group, Messaging Providers, Management Information Systems
Tell By Text	Educational Establishments	Contact Group, Messaging Providers, Management Information Systems

3. Data Access Policy

As part of our staff onboarding process all staff undergo CRB/DBS checks during their probation period.

Staff undergo video training for data protection which is reviewed and updated where appropaite.

Contact Group users are divided into two groups, Contact Group Employees and School Users

Contact Group Employees - General

To maintain a consistent approach, employees are given appropriate access rights based upon their operational requirements

Three levels of access rights are used –

Basic level required for general operational use

Administrator level which has full access to the entire database

- All user access is comprehensively logged
- Each user is issued with their own back office and system User ID with appropriate strong passwords
- Employees use these identities and passwords in keeping with security best practice (sharing of passwords is not permitted for example)
- Similarly, each uses a secure login and password for the Contact Group internal systems and network
- Employees are educated on matters of security and integrity, and the confidentiality of information
- User IDs and passwords are disabled upon any employee leaving the company
- Employees access levels are reviewed on a regularly basis to be appropriate to their role
- Any paper-based sensitive information is disposed of through onsite shredding

Contact Group Employees - Payments

Payment processing and back office in Contact Group is restricted to a small team of finance and operational staff.

Educational Establishment Users

- Our system has three distinct groupings of users, Addministrators, Basic Users and Data Managers.

- As part of the setup process, the system creates a secure password-based user account
- are shown how to create new users as part of the system training and are then responsible for creating and managing their own accounts
- These user accounts are controlled via the Contact Groyp administration website.
- Users are required to change their passwords regularly, and are reminded to use one that is secure
- Gaining support requires users to pass security screening when making enquiries to the Contact Group Helpdesk – ensuring that information is only passed to appropriate parties
- Administrators are responsible for the removal of user accounts after staff leave the school.

4. Key System Specifications

- Cloud based system that scales ahead of or with demand
- Secure web based user interface
- Responsive design that scales to the size of the device being used to access
- Free iOS and Android app for parents
- The software is written using a mixture of scalable software technologies
- Able to import data from the schools' Sims or other Management Information database in a secure/encrypted manner.

5. Data stored

The Contact Group maintains a series of database containing the following personal data for all products. For our parental engagement solutions we store the following:

Student Data	Parent/Carer Data	Staff Data	Payment Data
Admission Details Full Name Gender Registration Groups Year Group House Curriculum Groups Session Attendance Lesson Attendance Behaviour Incidents Detentions Achievements	Full Name Emails Telephone Numbers Relationship Priority	Full Name Staff Registration Emails Telephone Numbers	Payment Receipt Request Details

Additional services may require the storage of further data categories and is covered in dedicated data sharing agreements.

6. Data Upload Process

Educational Establishment held parent/pupil data can be uploaded from the school's Management Information System either automatically each night, or manually by a school user depending on the school's requirements. To achieve this data extraction Contact Group uses an in house developed server side piece of software. This data extraction software performs the following tasks;

- Gathers only data required to operate Contact Group services from the school MIS system

- Data transmission takes place once both ends of the service (School and Contact Group) have confirmed their identity by sharing login credentials and a unique API key
- Data is then transmitted in an encrypted form
- Once validated as the data is queued for import and imported

7. Parent/Staff Opt-out

Should a parent/carer/staff not wish to have their details shared with third party systems they <u>must</u> make their educational establishment aware of this in order for them to take the appropriate steps.

<u>Different school management systems have a variety of settings to prevent non-consent data to be shared. It is instructed that any individual have any concern to contact the data controller to make sure that these are set.</u>

The Contact Group make every effort to make sure that any consent being supplied is taken into account in our products.

8. Data Holding and Destruction Policy

The Contact Grup is committed to the protection of data held whilst customers are accessing the system and all data held in the database is encrypted and not stored in plain text. All communication between the user and the Contact Group services are encrypted and transmitted using SSL.

In the event that a customer cancels their agreement, access to their education establisgment area in our administration services are disabled on contract expiry or on the date requested by the customer, at this point the account is disabled. This means that the account is locked, not accessible and all personal data relating to Parents and pupil will be removed from our production environment after a 14-day period as will all sent messages/forms etc.

The Company will retain all transactional information for a period of at least 6 years as required by law. This retention period is for the use of the relevant authorities.

The educational establishment is responsible for also responsible for;

- Disabling and deleting any active Contact Group data extraction software that is running on their servers or MIS system.
- Downloading or requesting a copy of the full transactional payment and messaging history for their records as this will no longer be accessible once the account is closed.

9. SMS/Email Message Sending Process

Some of our services allow users with appropriate permissions to request messages are sent via our services. To achieve this the user selects the pupils/staff they wish to receive the message from the appropriate screens in products such as Call Parents. The message content is then typed into the message sending screen.

At the requested time the message is queued for delivery, here the mobile numbers of parents associated with the chosen pupils are pulled from the database. A list of numbers/addresses to

receive the SMS/emails are then sent with the message content to our SMS/Email service provider partners who send the content to each of the numbers provided.

Our SMS/Email providers then provides a Message ID for each of the messages sent which is later used to track delivery status of each SMS message.

10.   Software Renewal Policy

Contact Group utilises different software applications to deliver our online services. In the event that new versions of core software are released, for security, stability or performance reasons, we carry out thorough research and testing to determine if any of the updates could impact any of the components/functions that we use.

Should we highlight any changes that impact security and could comprise our services, we aim to have the software updated as soon as possible.

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.

Hardware updates take the form of total hardware swap out with new equipment minimising the risk of downtime.

11.   Useful information

Contact Group are data processors in regards to services for our educational establishment customers.

Contact Group is a trading name of Truancy Call Limited 5th Floor, Lyndon House, 58-62 Hagley Road, Birmingham, B16 8PE

Data Protection Registration Number – Z7911829
Company Registration Number – 4125665

If you have a more in-depth query that relates to Data Protection, please e-mail our Data Protection Officer at dpo@the-contactgroup.com