

Reviewed : October 2021

PRIVACY POLICY

Statement

As a school we need to use information about pupils, parents/guardians in order to safely and effectively run the school.

During pupils' scholarship with us, we will use information that we gather in relation to them for various purposes. Information that we hold in relation to pupils is known as "personal data". This will include data that we obtain from pupils or parents/guardians directly and data which we obtain from other people and organisations. We might also need to continue to hold personal data for a period of time after pupils have left the school. Anything that we do with personal data is known as "processing".

This document sets out what personal data we will hold about pupils or parents/guardians, why we process that data, who we share this information with, and pupils' or parents'/guardians' rights in relation to personal data processed by us.

It is very important that information about pupils or parents/guardians is kept safe. We explain below how the school keeps information safe. If pupils or parents/guardians want to know anything about what we do with information about them then please contact the school. The school wants pupils or parents/guardians to feel free to raise any questions at all. We also have a person called the Data Protection Compliance Manager who can answer any questions they have about what the school does with their information. If pupils or parents/guardians want to speak to the Data Protection Compliance Manager, they can arrange to do so by contacting the school. Our Data Protection Compliance Manager (or DPO Data Protection Officer) is Judicium Education 72 Cannon Street, London, EC4N 6AE.

Changes arising out of the General Data Protection Regulation, which entered into force in 2018, have placed some restrictions on the information schools might pass to parents.

Types of information

We will collect, hold, share and otherwise use information about pupils or parents/guardians listed below:

	Pupils	Parents/Guardians
Name and surnames	x	x
Date of Birth and Country of Birth	x	
Nationality	x	x
Gender	x	x
Language(s)	x	x
Siblings	x	
Address	x	x
Telephone and email contact details		x
Details of previous/future schools	x	
Timetable and class information	x	
Attendance information	x	
Assessment information	x	
Behavioural information	x	
Grants and allowance schemes	x	
Photographs	x	Specific projects
CCTV images	x	x
Profession		x

We also collect, hold, share and otherwise use some information about pupils which is “special category personal data”, such as:

- Special educational needs and disability information
- Information relating to keeping children safe
- Medical / health information
- Dietary requirements

We take extra care to ensure that special category personal data is kept safe

Collection of information

We get the information described in this document from:

- Pupils
- Parents/guardians and other children's parents
- Teachers and other staff
- People from other organisations, like doctors or the local authority for example

Use of information

Department for Education groups data items about pupils into the following groups:

- admissions
- personal identifiers, contacts and pupil characteristics
- identity management/authentication
- medical information and administration
- attainment
- attendance
- safeguarding and special educational needs
- behaviour
- catering
- trips and activities
- exclusions

We use personal information for the following reasons:

- As part of our admissions process
- To deal with emergencies or incidents involving pupils
- To facilitate activities, extra-curricular activities and trips
- To make sure that we give pupils a good education and to support them through this
- To make sure that we are able to address and support any educational, health or social needs our pupils may have
- To make sure everyone is treated fairly and equally
- To keep everyone at the school safe and secure
- To celebrate pupils' achievements
- To help pupils apply for or register with secondary schools and other organisations
- To compile statistics on secondary schools application processes & outcomes to improve our support and success rate and inform on pupils' destinations
- To provide reports and additional information to parents
- To deal with legal claims or debt recovery

We do some of these things according to our legal obligation. Other things we do in order to efficiently run the school.

Sometimes we need permission to use pupils' information, and we will therefore ask parents for permission. To address photographs of children, for instance, we provide a

specific notice to all parents and we ask that a form be filled in, signed and returned at the beginning of the school year.

We may need to use information about pupils which is special (special category personal data, mentioned above) where there is a specific interest to do so, for example for health and social care purposes or to provide pupils with equal opportunities and treatment. We will also use this information where parents have given us permission to do so.

There may also be circumstances where we need to use information in relation to legal claims, or to protect pupils' vital interests and where they are unable to provide their consent. The law does not prevent information about children being shared with specific authorities if it is for the purposes of safeguarding. Information that could be relevant to keeping a child safe should be shared so that informed decisions can be made about a child's welfare (see our *Safeguarding policy*). We may also share information on request with the British Home Office Inspector.

Information retention and destruction

We will hold information relating to pupils and parents only for as long as necessary. How long we need to hold on to any information will depend on the type of information (see below). Where pupils change school we will usually pass information to the new school.

Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)
Admissions		X Admissions files	X Admissions appeals	
Attainment			X	
Attendance		X		
Behaviour		X		
Exclusions		X		
Identity management and authentication	X images used for identity management			
Catering and school meal management		X		
Trips and activities	X (field file)		X (financial	X (major medical

	X (educational visitors into school)		information related to trips)	events)
Medical information and administration	X (permission slips)	X (medical conditions and ongoing management)		X Medical incidents (potentially)
Safeguarding				X
Personal identifiers, contacts and personal characteristics	X (images used in identity systems)	X (images used in displays in school)	X (postcodes) X (names) X (characteristics)	

Information sharing

We may share information with:

- Other schools or educational institutions pupils may attend, wish to apply to, or require support from
- Local Authorities, to assist them in the exercise of their responsibilities in relation to safeguarding purposes and in the event of grant allocation.
- The Department for Education, Ofsted and the AEFÉ as required by the law
- Contractors, to enable them to provide an effective service to the school, such as school meal providers or reference writers.

The National Pupil Database

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our pupils to the Department for Education as part of statutory data collections such as the school census and early years' census. Independent Schools are requested to submit census data annually in January. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013. To find out more about the NPD, go to

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether Department for Education releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

Security

It is very important that only people who need to use pupils' and/or parents' information can see it. The school keeps this information safe by using a number of technical and organisational measures. These include password protections, restricting access to information, locking hard copy sensitive information away and managing our own IT systems.

Key data subject's rights

In a school, pupils are data subjects, but so too are staff, parents/guardians and ex-pupils. All data subjects have

- o the right to be informed
- o the right of access
- o the right to rectification
- o the right to erasure

- o the right to restrict processing
- o the right to data portability
- o the right to object
- o rights in relation to automated decision making and profiling

Pupils and parents/guardians may ask to see the information we hold about them so long as it complies with applicable laws and regulations, such as the General Data Protection Regulation. If they wish to do this they should contact the school for the information they would like to see. Pupils and parents/guardians also have the right to:

- Object to what we are doing with their information
- Have inaccurate or incomplete information about them amended
- Ask us to stop doing certain things with their information in some cases
- Ask that decisions about them are not made using automatic systems
- Claim against the school in certain circumstances where you have suffered as a result of the school breaching your data protection rights

The school is not obligated to respond affirmatively to all requests and we will let requesters know where we are unable to fulfill a request due to our legal or safeguarding obligations.

Concerns

If pupils or parents/guardians are concerned about how we use their personal data, they can speak with the school. If necessary, they can also contact the U.K. Information Commissioner's Office at <https://ico.org.uk/concerns/>.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about our processing of personal data.