

## GRAVENEY TRUST – PRIVACY NOTICE

### Updated February 2018

#### Privacy Notice (How we use pupil information)

##### The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information including both external examination results and the results of internal tests and assessments
- Relevant medical information
- Information about a pupil's special educational needs,
- Information about pupils achievements as well as behavioural information including exclusions history
- Post 16 learning information

##### Why we collect and use this information

We use the pupil data enable us:

- to support pupil learning and ensure that the education we provide is appropriate to the needs of our pupils
- to monitor and report on pupil progress
- to provide appropriate pastoral care and welfare services
- to assess the quality of our services
- to comply with the law regarding data sharing with statutory and other bodies

##### The lawful basis on which we use this information

We collect and use pupil information under Article 6 1 b of the EU General Data Protection Regulations which provides for data to be processed where this is necessary for the performance of a contract to which the pupil is a party (i.e. registered at school), and Article 6 1 c which requires the School/Trust to comply with a legal obligation to share information with the Department for Education (also a requirement of the Education Act 1996).

Special category data is only processed where the explicit consent of the data subject (or their parent) has been given in accordance with Article 9 of the GDPR. The special categories that we seek to collect but which parents may refuse to provide are as follows:

Photographs used for any purposes other than identification  
Algorithm derived from finger print and held in such a way as to be recognisable only by school systems and that cannot be converted back to a biometric identifier  
Nationality  
Country of Birth  
Ethnicity  
First Language  
Whether the pupil's parent(s) is in the Armed Services

Where parents/pupils do not wish to declare the above data, the school will record each of these data categories as 'refused'.

Only students over 16 will be given the opportunity to provide consent for themselves, in addition to consent being provided by their parents. Where there is disagreement between the two, the Trust/school will attempt to mediate and reach a consensus. Where no such consensus can be reached the consent (or refusal of consent) from the parent will be used for this purpose.

### **Collecting pupil information**

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

### **Storing pupil data**

We hold pupil data at least until their 25<sup>th</sup> birthday.

### **Who we share pupil information with**

We routinely share pupil information with:

- schools/colleges/other education institutions that the pupil attends after leaving us
- our local authority and Youth and Careers Services Providers (see further below)
- the Department for Education (DfE)

When required, we also share information with:

- the National Health Service including the school nursing service
- other specialist health and welfare providers including but not limited to Education Psychology Service, Speech and Language service, CAMHS, Occupational Therapy Service and other organisations providing support of a health or welfare nature to our pupils

We also share information with a number of third party providers who offer facilities and services to parents and pupils on behalf of the schools/Trust. Details can be found in Schedule 1 of this Annex.

## Why we share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins national school funding and education arrangements.

We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

### Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### Youth support services

#### Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent or guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

#### Pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website.

### The National Pupil Database (NPD)

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 DfE as part of statutory data collections such as the school census and early years' census. 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 DfE 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>

To contact DfE: <https://www.gov.uk/contact-dfe>

### **Requesting access to your personal data**

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact Mrs Cynthia Rickman, Data Protection Officer for the Graveney Trust ([crickman@graveney.wandsworth.sch.uk](mailto:crickman@graveney.wandsworth.sch.uk)).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and

- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **Contact**

If you would like to discuss anything in this privacy notice, please contact: Mrs Cynthia Rickman, Data Protection Officer for the Graveney Trust (crickman@graveney.wandsworth.sch.uk).

## **INFORMATION SHARED WITH THIRD PARTY PROVIDERS**

We share information with a number of third party providers who offer on-line services and facilities to pupils and parents that we cannot offer ourselves through our existing systems. The providers we currently use include the following:

- Keep Kids Safe/PS Connect/Primary Contact – these systems provides the capacity to text and email parents about important matters such as their child’s attendance as well as school news and other updates. The information shared is limited to names, addresses, contact details (phone and email)
- Evolve – this system is the framework through which we manage our school journeys and visits. The information shared is as above, but will also include, where applicable, medical information and information about a child’s special educational needs where this may have an implication for the planning of the journey.
- Parentpay – this system enables parents to pay for school trips, school meals, text books and other items on line. The information shared is limited to parents name and email address and pupil name. All other data is provided directly by the parent.
- London Grid for Learning, and other on-line learning resources, e.g. Google Classrooms, Kerboodle, Pearson ActiveLearn etc. – these systems require us to share pupil’s email addresses or other unique pupil identifier (numeric) in order to generate individual passwords and logons.

Information obtained on the basis of ‘consent’ will not be shared with third party providers unless further consent for this processing has been obtained.

We reserve the right to extend this list as and when necessary to ensure the efficient delivery of services to parents and pupils and will update this document accordingly on an annual basis.