PRIVACY NOTICE FOR PUPILS AND THEIR FAMILIES

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils**, **parents and carers of pupils at our school**.

Our trust, Shirley High School, Shirley Church Road, Croydon, CR0 5EF. Tel: 0208 656 9755 is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Mr A Freeman (see 'Contact us' below).

2. What categories of information are processed?

The categories of personal information that we process include (but are not restricted to) the following:

- **Personal identifiers and contacts** – e.g. name, unique pupil number, contact details and address
- **Characteristics** – e.g. ethnicity, language and eligibility for free school meals
- **Safeguarding information** – e.g. court orders and professional involvement
- **Special educational needs and disabilities (SEND) information** – including the needs and ranking
- **Medical and administration** – e.g. doctors' information, general health, dental health, allergies, medication and dietary requirements
- **Attendance** – e.g. sessions attended, number of absences, reasons for absences and any previous schools you have attended
- **Assessment and attainment** – e.g. any relevant test and exam results
- **Behavioural information** – e.g. exclusions and any relevant alternative provision put in place
- **Photographs and CCTV images**
- **Biometric data -** Pupils fingerprints are stored digitally exclusively for the purpose of purchasing school meals (this data will be deleted when the pupil leaves the school)
- **Catering and Free School Meal data**

- **Participation in trips and activities**
- **Details of your family circumstances**
- **Records of your correspondence and contact with us**
- **Details of any complaints you have made**
- **Bank details**

3. Why do we collect and use your information?

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

- To get in touch with you when we need to
- To monitor, support and report on pupil attainment and progress
- To keep you informed about the running of the school (such as emergency closures) and events
- To provide appropriate pastoral care
- To assess the quality of our services
- To keep pupils safe
- To administer admissions waiting lists
- To carry out research
- To meet the statutory duties placed on us for government data collections

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Consent: the individual has given clear consent to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract with the individual.
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

Where you've provided us with consent to use your information, you may take back this consent at any time. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

4. How do we collect your information?

We collect your personal information via the following methods:

- Information provided by you on school registration forms
- Common Transfer File (CTF) from your previous school
- Local authorities

- Government departments or agencies
- Child protection plans
- Police forces, courts, tribunals

Pupil data is essential for the school's operational use. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

5. How do we store your information?

We hold your personal information securely for the set amount of time shown in the school's Data Retention Policy. A copy of this policy is available from the school's data protection officer.

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

For more information about how we keep your information safe, please see the school's Data Protection Policy which is available on the school website.

6. Who do we share your information with?

Where it is legally required, or necessary (and it complies with UK data protection law), we may share your information with:

- The local authority (LA)
- The Department for Education (DfE)
- The regulator, Ofsted
- Schools that pupils go to after leaving us
- Youth support services
- Law enforcement officials such as police or HMRC
- Local authority designated officers
- Professional advisors such as lawyers and consultants
- Suppliers and service providers (including insurance, IT support, information security)
- Providers of learning software such as Purple Mash
- Financial organisations
- Our auditors
- Survey and research organisations
- Security organisations
- Health and social welfare organisations
- Charities and voluntary organisations
- Police forces, courts and tribunals

7. Why do we share your information?

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

Youth support services

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

Sharing this information allows them to provide the following services:

- Youth support services
- Careers advisers
- Post-16 education and training providers

The information we share is limited to the pupil's name, address and date of birth; however, where a parent or guardian has provided their consent, other relevant information will be shared – this right to consent is transferred to pupils once they reach 16 years old.

The youth support services stores and retains this information in line with their policies.

Department for Education (DfE)

The DfE collects personal information from us and our Local Authority through various collections the school is required to undertake legally. We are required to share information about pupils with the DfE either directly or via our LA for the purpose of those data collections.

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework, which can be found by following this link: https://www.gov.uk/government/publications/security-policy-framework

8. How does the government use your data?

The pupil data that we lawfully share with the DfE through data collections:

- Underpins school funding, which is calculated based upon numbers of pupils and their characteristics in each school.
- Informs 'short-term' education policy monitoring and school accountability and intervention.
- Supports 'longer-term' research and monitoring of educational policy, e.g. how certain subject choices go on to affect education or earnings beyond school.

To find out more about the data collection requirements placed on us by the DfE, e.g. via the school census, follow this link: https://www.gov.uk/education/data-collection-and-censuses-for-schools

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the NPD. The NPD is owned and managed by the DfE and contains information about pupils in schools in England – it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE.

Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link:
https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice

Sharing by the DfE

The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:

- Schools
- Local Authorities
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data
- https://www.gov.uk/government/publications/dfe-external-data-shares

9. How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:
https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

You can also contact the DfE directly using its online contact form by following this link:
https://www.gov.uk/contact-dfe.

10. What are your rights?

You have specific rights relating to the processing of your data. These are the right to:

- Request access to the information the school holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.

- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Biometric data, pupils have the right to opt out of using their fingerprint to purchase a school meal
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information that we hold about you, please contact the school's data protection officer.

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's data protection officer in the first instance. You can also contact the Information Commissioner's Office (ICO) at https://ico.org.uk/concerns. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

11. How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent. If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the data protection officer.

12. Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

13. Contact us

If you any questions, concerns or would like more information about anything in this privacy notice, please contact our data protection officer:

- Mr A Freeman email: dpo@shirley.croydon.sch.uk

We want all at SHS to believe in and maintain the values of our school:

