



# The Schools of Woolton Hill

## PRIVACY NOTICE

### HOW WE USE PERSONAL INFORMATION ABOUT PUPILS

The Schools of Woolton Hill are the data control for personal information that you supply to us. This means the schools determine the purposes for which, and the manner in which, any personal data relating to pupils and their families is to be processed.

#### **Why do we collect and use personal information?**

The Schools of Woolton Hill hold the legal right to collect and use personal data relating to pupils and their families, and we may also receive information regarding them from their previous school, Local Authority and/or the DfE. (Department for Education)

The General Data Protection Regulation allows us to collect and use pupil information with consent of the data subject, (for infant school age children consent is from the parent or carer), where we are complying with a legal requirement, where processing is necessary to protect the vital interests of a data subject or another person, where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (the school).

When the personal information is Special Category information (such as religious, health, ethnic origins, biometric data) we may rely on processing being in the substantial public interest, in addition to the consent of the data subject and the vital interest of the data subject or another.

We collect and use personal data in order to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

In accordance with the above, the personal data of pupils and their families is collected and used for the following reasons:

- to support pupil learning
- to register a child at school
- to monitor and report on pupil progress
- to provide appropriate pastoral care and medical support
- to assess the quality of our services and how well our school is doing
- Statistical forecasting and planning
- to comply with the law (including legal requirements to share data with the local authority and Department of Education)
- to keep children safe (food allergies or emergency contact details)
- to meet the statutory duties placed upon us by the Department for Education • for security purposes, including CCTV in accordance with the School's CCTV Policy.

**The categories of personal information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attend) and exclusions
- Assessment information – EYFS and National Curriculum results
- Modes of travel
- Relevant medical information – medication and allergies
- Information relating to SEND
- Photographs – photos taken in school and on school trips
- Behaviour Information – number of temporary exclusions
- Safeguarding information
- Images on CCTV

**NHS Test & Trace**

To support NHS Test and Trace we collect information for the purposes of contact tracing. The following information will be collected: your name; contact phone number; the date you were at the school; and your arrival and departure times. The legal basis for our use of your information is that it is necessary for the performance of a public task carried out in the public interest. We may share your information with NHS Test and Trace. Your information will be retained for a period of 21 days. You have some legal rights in respect of the information we collect from you. You can contact the school's Data Protection Officer at: [adminoffice@st-thomas.hants.sch.uk](mailto:adminoffice@st-thomas.hants.sch.uk). If you have a concern about the way we are collecting or using your information, you should raise your concern with us in the first instance or directly to the ICO at <https://ico.org.uk/concerns/>

## **Collecting personal information**

Whilst the majority of personal 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 personal information to us, or if you have a choice in this. Where we are using your personal information only on the basis of your permission you may ask us to stop processing this personal information at any time.

## **Storing personal data**

Personal data relating to pupils at The Schools of Woolton Hill and their families are stored in line with the school's GDPR Data Protection Policy and Retention Policy.

In accordance with the GDPR, the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected and in line with the schools retention policy.

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

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Our local authority (LA - HCC Education Department)
- The Department for Education (DfE)
- The NHS

In some cases, data will be shared with a third party processor approved by the school; however, this will only be done with your consent, unless the law requires the school to share your data. Where the school shares data with a third party processor, the same data protection standards that the schools uphold are imposed on the processor.

## **Why we share pupil information**

We do not share personal information with anyone without consent unless the law and our policies allow us to do so. We share pupils' data with the Department for Education on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with our local authority (LA) and the Department for Education under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

CCTV images will be shared with the police on receipt of a written request, if these are required as part of a police investigation. (see CCTV policy)

## **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-collectionand-censuses-for-schools>).

## **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 the 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 pupil information we share with the Department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupildatabase-user-guide-and-supporting-information>.

The Department may share pupils' personal data with certain third parties, including:

- 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

For more information about the Department's NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers

fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website:

<https://www.gov.uk/government/publications/dfe-externaldata-shares>

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

Under data protection legislation, parents and pupils have the right to request 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 the Data Protection Officer (see contact details below)

You also have the right, subject to some limitations 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, you should raise your concern with us in the first instance or directly to 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

The Schools of Woolton Hill's Data Protection Officer, Mr Paul Davies, through the main school office or email, [adminoffice@st-thomas.hants.sch.uk](mailto:adminoffice@st-thomas.hants.sch.uk)