

# Privacy Notice (How we use pupil information)

**Claverham Community College** processes personal information about its pupils and is a 'data controller' for the purposes of Data Protection legislation. We collect information from you and may receive information about you from your previous school and the Learning Records Service. If you are enrolling for post-14 qualifications, the Learning Records Service will give us your unique learner number (ULN) and may also give us details of any learning you have done in the past or any qualifications you have.

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

- personal information (such as name, unique pupil number, contact details 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, absence reasons and any previous schools attended)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including individual needs and banding)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- assessment and attainment (such as key stage 2 data, current attainment data, post 16 courses enrolled for and any relevant results)
- behavioural information (such as rewards and sanctions, exclusions and any relevant alternative provision put in place)
- passport details (where applicable for certain trips)
- student photographs
- video and audio recordings
- CCTV images
- Parent/Carer details (such as name, address, contact details etc)

## Why we collect and use this information

We collect and use pupil information, for the following purposes:

- a) to support pupil learning
- b) to monitor and report on pupil progress
- c) to provide appropriate pastoral care
- d) to keep children safe (food allergies, emergency contact details, medical conditions, CCTV, student photographs)
- e) to assess the quality of our services
- f) to meet the statutory duties placed upon us
- g) to enter pupils for examinations
- h) to provide access to post 16 training providers, youth services and careers advisors
- i) to provide an effective school catering service

- j) to provide an online payment system for dinner money and trips
- k) to effectively monitor and manage payments for items including PE kit, school trips etc
- l) to book school trips and activities

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

We only collect and use pupils' personal data when the law allows us to. Most commonly, we collect and process personal data to enable us to comply with a legal obligation or we are acting in the public interest or exercising our official authority. We may also process pupil's data where we obtain consent from you or have a genuine legitimate interest which do not harm your rights or interests. Examples of the data we process under each lawful basis are outlined below:

### **Legal Obligation**

For admission to the school, providing data to the DfE such as the school census, special educational needs, keeping children safe in education and reporting and investigating accidents.

### **Public Interest**

Transfer of files to another educational establishment, sharing data with the exam boards, processing exam data, downloading KS2 results using the key2success portal, inputting and analysing assessment data using 4Matrix, generating target grades using FFT Aspire, monitoring behaviour, attainment, rewards and providing an online learning platform using Classcharts, monitoring and managing independent reading practice, providing digital learning resources and assessment materials, providing access to online careers guidance and protecting our staff and pupils using CCTV.

Special category data including race, ethnic origin, religion, health, sex life or sexual orientation is processed under Substantial Public interest.

### **Consent**

Official and unofficial school photographs, video and audio recordings, SAM online learning platform, healthcare plans, to book school trips and activities and to send out any communication to parents for anything taking place on the school site which is not school related.

Explicit consent will be requested for any special category data such as health.

Consent can be withdrawn at any time by writing to the college.

### **Legitimate Interest**

Providing access to post 16 training providers through UCAS progress, communicating with parents, supporting vulnerable groups with post 16 education through ESCC Youth Employability service, providing a canteen service (parentpay), monitoring library resources using Oliver Softlink and maintaining effective finance systems.

## How we collect 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.

Consent for official and unofficial school photographs, video and audio recordings, and parent communication for anything taking place on the school site is collected via a consent form. Consent for details requested as part of a health care plan is requested at the time of completion. Consent for trips and activities is collected via Parent Pay and consent for SAM learning is collected for specific pupils as required.

## How we store pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit [www.claverham.org](http://www.claverham.org).

## Who we share pupil information with

We routinely share pupil information with:

- schools that pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- youth support services (pupils aged 13+)
- Police
- Social services
- School Nurse/Schools Health Service
- Parent Pay
- Chartwells
- Online learning tools
- Edulink – Parent communication tool to view the information parents have already provided

## Why we regularly 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.

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections.

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

## 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

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the pupil once they reach the age of 16.

Data is securely transferred to the youth support service via the DfE 'Collect' website. It is stored on ESCC servers and held until the pupil reaches 25 years old.

### 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, please contact the college in writing addressed to Mrs S Pry (PA to the Principal).

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
- A right to seek redress, either through the ICO, or through the courts.

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/>

### Data Protection Officer

Peter Questier (East Sussex County Council, Information Governance Team. Children's Services)

However, please contact the school in the first instance if you have a query regarding this privacy notice or how your information is used.

## 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>

## How Government uses your data

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

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

## 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>