



Holyhead

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Privacy Notice - Students

Autumn Term

2020

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Policy Lead:	M Giudici

Privacy Notice for Students

Introduction

This notice is to help you understand how and why we collect your personal information and what we do with that information. It also explains the decisions that you can make about your own information. We are giving you this notice because you are mature enough to make decisions about your personal information. Holyhead school is the data controller of the personal information you provide to us. This means the school determines the purpose for which, and the manner in which, any personal data relating to students and their families is to be processed.

What is "personal information"?

Personal information is information that the school holds about you and which identifies you.

This includes information such as your name, date of birth and address as well as things like exam

results, medical details and behaviour records. The school may also record your religion or ethnic

group. CCTV, photos and video recordings of you are also personal information.

How and why does the school collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The school's primary reason for using your personal information is to provide you with an education.

Admission forms give us lots of personal information about you and your family. We get information about where you live, you parent/carer name and contact details including home telephone numbers, mobile numbers and e-mail addresses. We use this information to communicate with your parent/carers if we need to talk to them about your education, this may include for example contact about your behaviour, attendance or medical needs.

Your old school also gives us information about you so that we can teach and care for you.

Sometimes we get information from your doctors and other professionals where we need this to look after you.

We collect this information to help the school run properly, safely and to let others know what we do here.

Here are some examples:

- We need to tell the appropriate teachers if you are allergic to something or might need extra help with some tasks.
- We use CCTV to make sure the school site is safe and for your own safety. CCTV is not used in private areas such as changing rooms.
- We may need to report some of your information to the government. For example, we may need to tell the local authority that you attend the school or let them know if we have any concerns about your welfare.
- We may need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other students at the school.
- If you are from another country we have to make sure that you have the right to study in the UK. We might have to provide information to UK Visas and Immigration who are part of the government.
- Depending on where you will go when you leave us we may need to provide your information to other schools, colleges and universities or potential employers. For example, we may share information about your exam results and provide references. We may need to pass on information which they need to look after you.
- When you take your GCSEs we will need to share information about you with examination boards. For example, if you require extra time in your exams.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry.
- Occasionally we may use consultants, experts and other advisors to assist the school in fulfilling its obligations and to help run the school properly. We might need to share your information with them if this is relevant to their work.
- If you have misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling.
- We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
- We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This is to check that you are not misbehaving when using this technology or putting yourself at risk of harm.
- We may use photographs or videos of you for the school's website and social media sites or prospectus to show prospective students what we do here and to advertise the school. We may continue to use these photographs and videos after you have left the school.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.

- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.

Our legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your information. Holyhead School holds the legal right to collect and use personal data relating to students and their families, and we may also receive information regarding them from their previous school, LA and/or the DfE. 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 Students) (England) Regulations 2013

Public interest

This means that the processing is necessary for us to perform a task in the public interest or for our official functions the school relies on Public Task for most of the ways in which it uses your information.

These are some of the tasks we perform in the public interest:

- Providing you with an education.
- Safeguarding and promoting your welfare and the welfare of other students.
- Promoting the objects and interests of the school.
- Facilitating the efficient operation of the school.
- Ensuring that all relevant legal obligations of the school are complied with.

The school must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

Legal obligation

Where the school needs to use your information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Legitimate Interest

Your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow students.

Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Consent

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid.

Who do we share your data with?

We routinely share student information with:

- schools/colleges that the student's attend after leaving us
- our local authority
- the Department for Education (DfE)
- Alps
- Fisher Family Trust
- Pixl
- the school Nurse, the NHS, including CAMHS (for referrals, vaccinations etc)
- NHS/Public Health Agencies where relevant to the Covid pandemic

Department of Education (DfE)

We are legally required to share student's data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

Alps

We share data with Alps for legitimate interest reasons. The data is used to generate value added and benchmarking data, and to provide the school with appropriate target grades for each student. This allows us to compare our progress with other schools nationally.

Family Fisher Trust

We share data with the Family Fisher Trust for legitimate interest reasons. The data is used to provide the school with appropriate target grades for each subject and student.

Youth support services

Once our students reach the age of 13, we also pass student 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 / student once he/she reaches the age 16.

We will also share certain information about students 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 students 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 students 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 students) (England) Regulations 2013.

To find out more about the NPD, go to

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

The department may share information about our students 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 student 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.

Our students 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 how long do we keep your information?

Typically, the legal recommendation for how long to keep student personnel files is up to 7 years following departure from the School. However, special educational needs files, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

What decisions can you make about your information?

From May 2018 you will be able to make various decisions about your information. Some of these are new rights whilst others build on your existing rights.

Your rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer; and
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- Where the processing of your data is based on your consent, you have the right to withdraw this consent at anytime.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us first using the following email address:

dpo@holyheadschool.org.uk.