



### **How we use pupil information**

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR. If this notice, or any information linked to it is unclear, please contact the school office, or the school's Data Protection Officer. Contact details for both are available at the end of this privacy notice.

We, Gunnersbury Catholic School, are the Data Controller for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about parents and pupils.

As a public body we have appointed a Data Protection Officer (DPO), Craig Stilwell, Judicium Consulting Ltd, [dataservices@judicium.com](mailto:dataservices@judicium.com). Telephone: 0203 326 9174

#### **1. The categories of pupil & parent information that we collect, hold and share include but are not limited to:**

- Personal information such as name, pupil number date of birth, gender and contact information;
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- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Special categories of personal data (including biometric data, ethnicity, relevant medical information, special educational needs information)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Performance and assessment information (such as data scores, tracking, and internal and external testing)
- Relevant medical information (such as NHS information, health checks, physical and mental health care, immunisation program and allergies)
- Special educational needs information (such as EHCP's, statements, applications for support, care or support plans)
- Safeguarding information
- Exclusion information
- Behavioural information
- Photographs (for internal safeguarding & security purposes, school newsletters, media and promotional purpose)

- Images of pupils engaging in school activities, and images captured by the School's CCTV system;
- Payment details for finance purposes
- Post 16 learning information
- Information about the use of our IT, communications and other systems, and other monitoring information
- Recordings of pupils and/or parents from the School's video conferencing platform
- Post 16 learning information
- Financial details

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

## **2. Why we collect and use this information**

We use the pupil and parent data:

- to support pupils teaching and learning
- to provide education services and extra-curricular activities to pupils
- to monitor pupils' progress and educational needs
- to provide appropriate pastoral and medical care
- for safeguarding and pupil welfare purposes
- Pupil selection (and to confirm the identity of prospective pupils and their parents); Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy
- To make use of photographic images of pupils in school publications, on the school website and on social media channels
- for research purposes
- to inform you about events and other things happening in the school
- to assess the quality of our services
- to manage internal policy and procedure
- for giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils
- to carry out statistical analysis for diversity purposes;
- for legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- to enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate
- to comply with the law regarding data sharing
- for security purposes including CCTV and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school

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

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; and
- 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.

### 4. 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. Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### 5. Storing pupil data

The School keeps information about pupils on computer systems and on paper. Except as required by law, the School only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy. Full details on how long we keep personal data for is set out in our data retention policy.

### 6. Biometric Data

At Gunnersbury School we would like to use your information as part of an automated (i.e. electronically operated) recognition system. This is for the purposes of the library booking system and in the 6<sup>th</sup> form for attendance. The information that we wish to use is referred to as 'biometric information'. This data will only be processed once we have obtained appropriate consent. For further information in relation to this, please see our Biometrics Policy.

## 7. Who we share pupil information with

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way, we can make sure you stay safe and healthy, or we are legally required to do so.

We share pupil information with:

- The Local Authority
- The Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013
- The pupil's family and representatives
- Educators and examining bodies
- Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- NHS
- Local Authority Designated Officer
- Health and social welfare organisations
- Youth support services – under section 507B of the Education Act 1996, to enable them to provide information regarding training and careers as part of the education or training of 13-19 year olds
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- Professional consultants and support services (including insurance, IT support, information security);
- Providers of learning software Charities and voluntary organisations
- Law enforcement officials such as police, HMRC Professional bodies
- schools that the pupil's have attend or will attend

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We do not share information about our pupils with anyone without consent unless otherwise required by law.

## 8. 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 which underpins school funding and educational attainment.

## 9. Retention periods and security

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention policy.

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way).

## 10. 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.

We must provide the pupils name, the parents name(s) and any further information relevant to the support services role.

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.

## 11. 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.

## 12. 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>

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 education record, contact [office@gunnersbury.hounslow.sch.uk](mailto:office@gunnersbury.hounslow.sch.uk)

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

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. If you want to request information, please see our Data Protection Policy for the subject access request procedure.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

Craig Stilwell, Judicium Consulting Ltd, [dataservices@judicium.com](mailto:dataservices@judicium.com).

Telephone: 0203 326 9174.

Parents/carers also have a legal right to access to their child's educational record. To request access, please contact [office@gunnersbury.hounslow.sch.uk](mailto:office@gunnersbury.hounslow.sch.uk)

#### **14. Right to withdraw consent**

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the business manager at [office@gunnersbury.hounslow.sch.uk](mailto:office@gunnersbury.hounslow.sch.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### **15. Contact us**

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the business manager at [office@gunnersbury.hounslow.sch.uk](mailto:office@gunnersbury.hounslow.sch.uk) in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the business manager, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited  
Address: 72 Cannon Street, London, EC4N 6AE  
Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)  
Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)  
Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>

#### **16. Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.