



PRIVACY NOTICE – FOR PUPILS (How we use children’s and young person’s information)

The Grand Union MAT is the Data Controller for the use of personal data in this privacy notice.

Introduction

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This notice explains how we collect, store and use personal data about pupils at our school, like you.

You are being provided with this notice because current guidelines state that pupils from the age of 13 are considered mature enough to make decisions about their own personal information.

This notice provides details about:

- The personal information we collect about pupils
- How we collect that personal information
- What we do with the personal information
- Your rights in relation to any personal information held and processed by the school.

Our Data Protection Officer is Mr Kamal Thacker (Deputy Headteacher) and he is the named person with responsibility for ensuring that individuals' personal information is held and processed in the correct way. He can be contacted at kthacker@featherstonehigh.ealing.sch.uk. Questions about this notice, or requests for further information, should be directed to him.

The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – such as other schools, the local council and the government.

Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Your contact details
- Your test results
- Your attendance records
- Details of any behaviour issues or exclusions
- Information about how you use school computers and other IT and communications systems.

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about your characteristics, like your ethnic background or any special educational needs
- Information about any medical conditions you have
- Photographs and CCTV images.

Why we use this data

We use the data listed above to:

- a. Get in touch with you and your parents or carers when we need to
- b. Check how you're doing in exams and work out whether you or your teachers need any extra help
- c. Track how well the school as a whole is performing
- d. Look after your wellbeing
- e. Make sure our computers and other school systems and equipment are used appropriately, legally and safely.

Our legal basis (grounds) for using pupils' personal data

There are several reasons why we hold, process and share pupils' personal data. Under data protection laws, the lawful reasons for processing personal data include:

- Consent
- For the performance of a contract
- To comply with a legal obligation
- To protect the vital interests of the pupil or another person
- For a task carried out in the public interest
- For a legitimate interest of the school or one of the organisations it shares data with (e.g. Department for Education) except where those rights are overridden by the fundamental interests or rights of a pupil (who may require protection)

Sometimes the handling of pupils' personal data falls within several of the above lawful grounds.

Consent

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

Legal obligation

This is where we need to use pupils' personal data to comply with a legal requirement.

Statutory reporting requirements to the Department for Education (DFE) are included within this section. As is disclosing information to third parties such as the courts or the police where we are legally obliged to do so.

Vital interests

This legal basis can be used where, for example, we need to disclose information about pupils to prevent them or someone else from being seriously harmed. An example can include providing information to a medical professional about a pupil in circumstances where they are unable to provide the information themselves. It is likely to cover an emergency medical situation.

Public interest

We consider that we are acting in the public interest when providing education.

Specifically, we have a public interest in:

- Providing an education
- Fulfilling our safeguarding obligations and investigating complaints that may be directly connected with you or may require access to your personal data when investigating complaints by others
- Promoting the interests of the school
- Managing the school efficiently.

Legitimate interests

We have many legitimate (valid) interests for which we hold, retain, process and share pupils' personal data. The GDPR states that the exception to using this ground is where it is detrimental to a pupil's interests or rights.

Why do we collect and process pupils' personal data?

We use pupils' personal data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Assess the quality of our services
- Comply with the law regarding data sharing.

How do we obtain personal data?

We obtain personal data in a variety of ways. Some of the information comes from the admissions forms and acceptance forms which have been supplied to us. We also receive information about pupils from other schools and national / local agencies, such as healthcare professionals or the police. Data is also obtained from your parents, carers or guardian's, your teachers and other pupils.

With whom do we share pupils' personal data?

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 DFE on a statutory (legal) basis. This data sharing underpins school funding and educational attainment policy and monitoring.

Pupils' data, where it is reasonable to do so, may also be shared with other professionals contracted by the school, such as connexions advisers or insurers covering educational visits. In addition, a data security contract with a third-party IT services provider or as part of cloud-based storage may also process your personal data for the purpose of securely holding and protecting your data.

National Pupil Database

We have to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations, such as organisations that promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data. You can find more information about this on the Department for Education's webpage on [how it collects and shares personal data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

Storing your data

We keep personal information about you while you're attending our school. We may also keep it after you stop attending our school, if this is necessary. Our [data retention schedule/records management policy] sets out how long we keep information about pupils.

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, changed, or disclosed (given or told to someone else).

We'll dispose of your personal data securely when we no longer need it.

For pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our local authority (LA) and connexions services, because 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 such as:

- Youth support
- Careers advice
- Post-16 education and training providers.

A parent, carer or guardian can request that only your name, address and date of birth is passed to the local authority (LA) or Ealing Connexions services by informing us. This right is transferred to the child / pupil once they reach the age 16.

Further examples of why we collect, hold and share pupils' personal data

Here are some further examples of why we collect, hold and share pupils' personal data. If you would like more information about any of these, please contact our Data Protection Officer.

- We may need to share information about your health and wellbeing with those who have responsibility for pupil welfare
- We need to tell all appropriate members of staff if you have specific medical needs
- We need to tell all appropriate members of staff if you might need extra help with some tasks
- We may need to provide information containing your personal data to other schools and colleges. We may need to pass on information which they need to look after you. For example, how well you have behaved at other schools and your test results
- We may need to share data with external examination boards
- Where we have the right to do so, we may share your academic and behaviour records with your parent, carer or guardian
- We will only share your information with other people and organisations when we have a legitimate (valid) reason to do so
- If you are involved in a serious incident, and the police have become involved, we may need to share information with the police and record any action taken

- We are required to share information about our pupils with our local authority (LA) and the DFE under the Education (Information About Individual Pupils) (England) Regulations 2013
- Sometimes we need to share information with the police or our legal advisers to help with an inquiry. For example, safeguarding issues or injuries
- We might need to share pupils' information with consultants, experts and other advisers who assist us in the running of the school, if this is relevant to their work
- On occasions external consultants/contractors may have temporary access to personal data held by the school. For example, IT consultants might be granted temporary access to pupils' personal data in order to fulfil their contract(s). Access will only be granted to consultants who have demonstrated compliance with the school's data protection standards
- The school uses various IT systems. This may include using cloud-based storage systems to hold pupil data. Before use, the school ensures that adequate security measures are in place
- We may need to share some information with our insurance provider to ensure we maintain cover or to process any claims
- We may need information about any court proceedings or judgements concerning you. This is so that we can safeguard your welfare and the welfare of other pupils at the school
- We may monitor your use of the school's email, internet and other electronic devices provided by the school eg iPads. We monitor in order to ensure appropriate use of these technologies and to confirm that you are not putting yourself at risk of harm
- We have CCTV in operation to make sure the school sites are safe. CCTV is not used in private areas such as changing rooms
- We may use photographs or videos of you on our website, social media sites, newsletters and publications as part of our advertising of the school
- We publish our exam results and other news on the website. We also send articles, photographs and videos to local and national news outlets to celebrate the school's successes
- Sometimes we use photographs and videos to support curriculum activities, for example, to provide feedback on a presentation you may have given.

Automated decision-making and profiling

We do not make automatic decisions or undertake automated decisions regarding individuals to evaluate certain information about an individual (profiling).

Special categories of personal data

We must also comply with an additional condition where we process special categories of personal data. These special categories include: personal information revealing racial or ethnic origin, religious beliefs, biometric information and health information (possibly including sexual health).

Some of the reasons we process such data on pupils include:

- Legal claims. The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisers and insurers
- Medical purposes. This includes medical treatment and the management of healthcare services
- For compiling census data as required by law.

How do we protect pupils' personal data?

We take the security of pupils' personal data very seriously. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our staff in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate

technical and organisational measures to ensure the security of data. For example, we ensure the school uses encrypted devices, uses passwords, virus protection and has appropriate firewalls.

Sending information to other countries

With cloud-based storage and some other services sometimes being supplied outside the UK, personal data can be sent to other countries. This is not a problem even if our servers and storage systems are based in the EU and the European Economic Area (EEA) as they are also covered by GDPR. We have ensured that appropriate safeguards are in place to protect pupils' personal data.

What rights do you have in relation to your information?

How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (unless there's a really good reason why we shouldn't):

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data (decisions made by a computer or machine, rather than by a person), and any consequences of this
- Give you a copy of the information in an understandable form.

You may also have the right for your personal information to be shared with another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

- Say that you don't want your personal information to be used
- Stop it being used to send you marketing materials
- Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation if the data protection rules are broken and this harms you in some way.

To exercise any of these rights, please contact us (see 'Contact us' below).

Complaints

We take any complaints about how we collect and use personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please let us know first.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Contact us

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

- Mr K. Thacker, Deputy Headteacher – kthacker@featherstonehigh.ealing.sch.uk

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 8th January 2024.