

Greig City Academy

Privacy Notice – how we use student and parent/carers information

1. Introduction

Under the UK General Data Protection Regulation (UK GDPR) individuals have a right to be informed about how the school uses any personal data that we hold about them.

This privacy notice explains how we collect, store, use and share student and parent/carers personal data.

We, Greig City Academy at High Street, Hornsey, N8 7NU, are the Data Controller for the purposes of data protection law.

As a public body we have appointed a Data Protection Officer (DPO):

Paul Letford, Assistant Vice Principal

T: 020 8609 0148 E: pletford@greigcityacademy.co.uk

In this privacy notice all references to 'you/your' include both the student and the student's parents/carers, both individually and collectively, unless otherwise specified.

2. The personal data that we collect, use, store and share (when appropriate) include (but are not limited to):

- Personal information (such as name, date of birth, unique student number and address, parent's/carers' national insurance number)
- Contact information (names and contact details of parents, telephone numbers, email addresses for you and emergency contacts)
- Protected characteristics (such as ethnic background, language)
- Free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons, any previous schools attended)
- Assessment and attainment information (such as KS2/4/5 results, tracking, and internal and external testing)
- Behavioural information (such as exclusions and any alternative provision in place)
- Relevant medical information (such as doctor's details, medical conditions and diagnoses, NHS information, health checks, physical and mental health care, immunisation programme, medication and dietary requirements, allergies)
- Special Educational Needs (such as EHCPs, applications for support, care or support plans and support providers)
- Safeguarding information (such as court orders and professional involvement)
- Biometric data (fingerprints) for using the school canteen

- Bank account details for sixth formers receiving bursary payments
- Photographs (for internal safeguarding and security purposes, school newsletters and publications and, only with additional permissions, for media and promotional purposes).
- CCTV images captured in school

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

- Information about any health conditions you may have that we need to be aware of

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

3. Why we collect and use this information

We use this data to

- support students' learning
- monitor and report on student progress and attainment
- provide appropriate pastoral care and safeguard students
- keep students safe (food allergies or emergency contact details)
- report to parents/carers on your child's attainment and progress
- keep you informed about the running of the school (such as emergency closures) and events
- process payments for school services and clubs
- administer admissions waiting lists
- assess the quality of our services
- meet the statutory duties placed upon us for the Department for Education (DfE) data collections
- comply with the law regarding data sharing
- carry out research
- make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

4. The lawful basis on which we use this information

This section contains information about the lawful basis that we are relying on when handling your information. These are defined under Data Protection law and are:

- You have given consent for one or more specific purposes
- Processing is necessary to comply with the Academy's legal obligations
- Processing is necessary to protect your vital interests

- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education)
- Processing is necessary for the Academy's legitimate interests or the legitimate interests of a third party.

When we process special category information, which is deemed to be more sensitive, the following lawful bases are used:

- You have given explicit consent
- It is necessary to fulfil the Academy's obligations or your obligations
- It is necessary to protect your vital interests
- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
- Reasons of public interest in the area of public health

An example of how we use the information you provide is:

The submission of the school census returns, including a set of named pupil records, is a statutory requirement on schools under Section 537A of the Education Act 1996. Putting the school census on a statutory basis:

- means that schools do not need to obtain parental or student consent to the provision of information
- ensures schools are protected from any legal challenge that they are breaching a duty of confidence to students
- helps to ensure that the returns are completed by schools

5. Collecting your information

We collect student and parent/carer information via our admissions form completed by new students and their parents/carers and via Common Transfer Files (CTF) from previous schools.

Student data is essential for the schools' operational use. Whilst the majority of student information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

Where we have obtained consent to use your 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.

6. Storing your personal data

We hold student data securely while the student remains at Greig City Academy. The majority of this will be stored in the student's file and this file will follow the student whenever they move schools and then be retained by the last school they attend.

The student's data will be retained until the student reaches the age of 25, usually seven years after leaving their final school. Where there is a legal obligation to retain the information beyond that period (for example where there have been safeguarding concerns or special educational needs), it will be reviewed and may be retained in line with our retention policy.

We keep personal information about parents/carers whilst their child is attending the school. We may also keep it beyond their child's attendance at our school if this is necessary. Our (record retention schedule) sets out how long we keep information about parents and carers. You can request a copy of the schedule from our Data Protection Officer:

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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

7. Those with whom we share your personal information

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with appropriate third parties, including but not limited to:

- Haringey local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education – to meet our legal obligations to share certain information
- Ofsted – during the course of a school inspection
- Examining bodies – such as ensuring we adhere to examining regulations to guarantee validity of examinations
- Our auditors – to ensure compliance with our legal obligations
- Health authorities (NHS), health and social welfare organisations - to ensure the wellbeing of students
- Professional advisers and consultants – for us to develop our services
- Police forces, courts, tribunals, security services
- Professional bodies
- Schools that students attend after leaving the Academy

We also share personal data with third party organisations which provide services to us. This data is shared only where it is essential for the service to be provided. We currently provide student level data for the following purposes:

- to provide core school business services
- to run core IT systems, e.g. for school emails
- to support learning through curriculum products

8. Transferring Data Internationally

We may send your information to other countries where:

- we or a company we work with store information on computer servers based overseas or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the UK GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations which process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk. Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

9. Why We Share Information

In order to successfully perform our key functions, we need to share personal data with organisations. For example, we share students' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our students with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

10. 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>.

11. Youth support services: students aged 13+ and 16+

Once our students reach the age of 13, we are required to pass student information to our local authority 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 be passed to their local authority or provider of youth support services by informing us. This right is transferred to

the child/student once they reach the age of 16.

We are required to share certain information about students aged 16+ with our local authority 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 Haringey Council's website.

12. Learner Record Service

Once our students reach the age of 14, we will pass on certain information used by the Learner Records Service (LRS), an executive agency of the Department for Education (DfE), to issue a Unique Learner Number (ULN), and to create a Personal Learning Record. For more information about how your information is processed and shared refer to the [LRS privacy notice - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

13. The National Pupil Database

The NPD is owned and managed by the Department for Education and contains information about pupils/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 Pupils) (England) Regulations 2013.

To find out more about the NPD, go to: <https://www.gov.uk/government/publications/national-pupil-database-userguide-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.

For more information about the Department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-researchdata>.

For information about which organisations the Department has provided pupil/student information (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-databaserequests-received>.

To contact DfE: <https://www.gov.uk/contact-dfe>.

14. Your data protection rights

14.1 How to access personal information that we hold about you

Under data protection legislation, parents/carers and students have the right to request access to information about you that we hold, through a Subject Access Request.

An individual's data belongs to them therefore a child's data belongs to that child, and not the child's parents or carers.

Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of invoking a data request. Therefore, for children under the age of 12 most data requests from parents or carers of pupils at our school may be granted without the express permission of the student. This is not a rule and a student's ability to understand their rights will always be judged on a case-by-case basis.

Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of students may **not** be granted without the express permission of the student. This is not a rule and a student's ability to understand their rights will always be judged on a case-by-case basis.

If you make a subject access request, and if we do hold information about you or your child, we will:

- give you a description of it
- tell you why we are holding and processing it, and for how long we will keep it
- explain where we got it from, if not from you or your child
- 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

When responding to requests, we will not disclose information if it:

- Might cause serious harm to the physical or mental health of the child or another individual; or
- Would reveal that the child is at risk of abuse, where the disclosure of that information; would not be in the child's best interests; or
- Is contained in adoption or parental order records; or
- Is given to a court in proceedings concerning the child

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

If you would like to make a subject access request, please see **Contact us** at Section 10 below.

14.2. Your other rights regarding your data:

You have the right to:

- withdraw consent to processing data at any time, this relates only to date for which the school relies on consent as a lawful basis for processing
- ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- prevent the use of your personal data for direct marketing
- challenge processing which has been justified on the basis of public interest, official authority or legitimate interests
- request a copy of agreements under which your personal data is transferred outside of the United Kingdom
- object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, which might negatively affect you)
- request a cease to any processing that is likely to cause damage or distress
- be notified of a data breach in certain circumstances
- submit a complaint to the ICO
- ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

If you would like to make a subject access request or exercise any of the rights listed above, please contact our **Data Protection Officer (DPO):**

Paul Letford, Assistant Vice Principal

T: 020 8609 0148 E: pletford@greigcityacademy.co.uk

The School will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, but individuals are asked to preferably submit their request in written format to assist with comprehension.

Requests should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the request

If any member of staff, governor or volunteer receives a request, they must immediately refer it to the DPO.

15. Responding to subject access requests or queries as to your rights

In most cases, we will respond to requests within one month, as required under data protection legislation. However, we are able to extend this period by up to two months for complex requests or exceptional circumstances.

We reserve the right to verify the requester's identification by asking for Photo ID, if this proves insufficient then further ID may be required.

If the request is manifestly unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which would only take into account administrative costs.

A request will be deemed to be manifestly unfounded or excessive if it is repetitive or asks for further copies of the same information.

In the event we refuse a request, we will tell the individual why, and tell them they have the right to refer a complaint to the Information Commissioner's Office.

16. Complaints

We take any complaints about our collection and use of personal information seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer

Paul Letford, Assistant Vice Principal

T: 020 8609 0148 E: pletford@greigcityacademy.co.uk

- Alternatively, you can make a complaint to the Information Commissioner's Office (ICO):
- Report a concern online at <https://ico.org.uk/concerns/>
- Call the ICO on 0303 123 1113

17. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

Paul Letford, Assistant Vice Principal

T: 020 8609 0148 E: pletford@greigcityacademy.co.uk

