



# HOLYWELL SCHOOL

## Student Privacy Notice

### PRIVACY NOTICE (HOW WE USE STUDENT INFORMATION)

Holywell School processes personal data. This document outlines the purpose for which we process data, on what legal basis, and other areas relating to data processing such as the type of data we hold. It also covers the rights of individuals. From the 25th May 2018 data will be processed under the European General Data Protection Regulation.

### FOR WHAT PURPOSE DO WE COLLECT PERSONAL DATA?

- To support student learning
- To provide education services (including SEN), career services, and extra-curricular activities to students
- To monitor and report on students' progress and educational needs
- For the purposes of student assessment: to enable students to take part in national or other assessments, and to publish the results of public achievements of students of the School;
- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of School trips;
- To give and receive information about past, current and prospective students, to/from any educational institution that the student attended or where it is proposed they attend;
- To maintain relationships within the School community
- To assess the quality of our services
- For the purposes of management planning and forecasting, research and statistical analysis
- To enable the relevant authorities to monitor the School's performance;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use of ICT Policy;
- To identify students (inc. through the use of photographic images)
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations; and Where otherwise reasonably necessary for the School's purposes, including to
  - obtain appropriate professional advice and insurance for the School.
  - to monitor and report on student progress
  - to comply with the law regarding data sharing

### ON WHAT BASIS DO WE COLLECT AND HANDLE PERSONAL DATA?

We collect and use student information under Article 6 and Article 9 of the European General Data Protection Regulation from 25 May 2018. Under Article 6(1)(e) our lawful basis for processing data is that it is a Public task and the processing is necessary for us to perform a task in the public interest. Under Article 9(2)(g) our lawful basis for processing sensitive data is that processing is necessary for reasons of substantial public interest. We also collect and use data under section 537A of the Education Act 1996 and section 83 of the Children's Act 1989.

### THE CATEGORIES OF STUDENT INFORMATION THAT WE COLLECT, HOLD AND SHARE INCLUDE:

- Personal information (such as name, date of birth, unique student number, contact details and address)
- Characteristics (such as ethnicity (Special Category Data), language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)

- Assessment information – including internal assessment, national curriculum assessments and external exam results.
- Medical information (Special Category Data)
- Special Needs Information
- Behaviour and exclusions information
- Contact Details
- Student photographs

#### COLLECTING STUDENT INFORMATION

Whilst the majority of student 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 student information to us or if you have a choice in this. This includes the use of photographs for publicity.

Images of parents, students and other visitors to the School will be captured by our CCTV system which monitors the corridor outside of the main toilets and the general play area outside of room 23. These images are collected and stored in line with the School's Site Security and Access Control Policy and Data Protection Policy. The images do not leave School premises and are never shared with any third party, with the potential exception of law enforcement agencies in the event of a security breach. Images are kept for no longer than 10 days.

#### STORING STUDENT DATA

We hold student data currently from admissions in September 1995.

When a child leaves the School, our records for that child will be archived on our database for 25 years from the child's DOB, or 35 years in the case of SEN information

#### WHO DO WE SHARE STUDENT INFORMATION WITH?

WE ROUTINELY SHARE STUDENT INFORMATION WITH:

- schools that the student's attend after leaving us
- our local authority
- the Department for Education (DfE)

#### OTHER CATEGORIES OF RECIPIENTS OF STUDENT INFORMATION INCLUDE.

- Health and Education professionals
- Communication providers
- Providers who support the tracking of student learning
- The multi-agency panel
- Payment and security systems

#### AS WELL AS PROCESSING PERSONAL DATA THAT WE COLLECT FROM YOU WE ALSO OBTAIN INFORMATION FROM OTHER SOURCES INCLUDING.

- Previous Schools
- Health Professionals
- Local Authority
- Other educational providers

#### THE DEPARTMENT FOR EDUCATIONS DATA AND LOCAL AUTHORITY

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 the (DfE) under regulation 5 of The Education (Information About Individual Students) (England) Regulations 2013.

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>.

For more information about the department's data sharing process including the National Student Database, please visit:

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

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

<https://www.gov.uk/government/publications/national-student-database-requests-received>

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

### OUR STUDENTS AGED 13+

Once our students reach the age of 13, we also 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 / 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.

### SHARING STUDENT INFORMATION

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

### REQUESTING ACCESS TO YOUR PERSONAL DATA

Under data protection legislation, parents and students 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, contact the Data Controller named below.

You also have the right:

- to be informed of how we use personal data. This is done through this privacy notice.
- to have personal data rectified if it is inaccurate or incomplete.
- of erasure. This is also known as the right to be forgotten.
- of data portability.
- to object to processing.

The information commissioner's office provide detailed guidelines on the individual rights. This can be found on the link below.

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at

<https://ico.org.uk/concerns/>

### CONTACT:

If you would like to discuss anything in this privacy notice, please contact:

Data Controller: Mr M G Simpson, Headteacher, email: [dco@holywellschool.co.uk](mailto:dco@holywellschool.co.uk)

Data Protection Officer: Mr C Beeden, email: [dpo@holywellschool.co.uk](mailto:dpo@holywellschool.co.uk)

**Retention Information**

We use the Retention Guidelines for Schools from the Information and Records Management Society.