

Privacy Notice for Students age 13+

Under data protection law, individuals have a right to be informed about how a data controller uses any personal data that is held about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

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 relates 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.

This privacy notice explains how we collect, store and use personal data about **you, as a student at a Greenshaw Learning Trust School**

Students are asked to read this notice before completing the school's student registration form. A version is also sent to your parent / carer.

Who we are

You already know that your school is called Broadwater School and that it is part of the Greenshaw Learning Trust and we have to tell you that the Greenshaw Learning Trust is the organisation which is in charge of your personal information. This means that the Greenshaw Learning Trust is called the Data Controller.

The postal address of the Greenshaw Learning Trust is:

Grennell Road
Sutton
SM1 3DY

Alternatively, you can email us at info@greenshawlearningtrust.co.uk

If you want to discuss, correct or update your personal information you should contact the school directly. You can leave a letter at reception or send one by post to:

Nathan Smith Rogers
Deputy Headteacher and Data Protection Lead
Broadwater School
Summers Road
Godalming
Surrey GJ7 3BW
01483 414516

CATEGORIES OF INFORMATION WE COLLECT, PROCESS, HOLD AND SHARE

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)

- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)

Biometric Data

Greenshaw Learning Trust schools can use your information as part of an automated (i.e. electronically operated) recognition system. This is to allow access to the cashless catering system. The information that is used 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 Biometric Data Usage Procedure, which is available on the GLT website,

www.greenshawlearningtrust.co.uk

WHY WE USE THIS DATA & RETENTION

The Greenshaw Learning Trust collects and holds personal information relating to our students and may also receive information about them from their previous school, local authority and / or the Department for Education (DfE). The personal data collected is essential for the schools to fulfil their official functions and meet legal requirements. We use this personal data to:

- support learning
- monitor and report on progress
- provide appropriate pastoral care
- assess the quality of our services
- keep children safe (emergency contacts, food allergies)
- to meet the statutory duties placed upon us by the Department of Education
- to comply with the law about sharing personal data
- provide a managed learning environment
- provide a Communication Management Platform (to send communication to parents by email and text)
- to provide EPOS (electronic point of sale service provider for cashless catering)

This information will include contact details, national curriculum assessment results, attendance information, any exclusion information, destination (where students go after they leave us) and personal characteristics such as ethnic group, any special educational needs as well as relevant medical information. We will also use photographs of students in accordance with the permissions indicated by parents/students on the student registration form.

For students enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing student information are:

- The Greenshaw Learning Trust is under a legal obligation to collect the information or the information is necessary for us to meet legal requirements imposed upon us such as our duty to safeguard students.
- It is necessary for us to hold and use your information for the purposes of our functions in providing schooling and so we can look after our students. This is a function which is in the public interest because everybody needs to have an education. This means we have a real and proper reasons to use your information.
- We will not usually need your consent to use your information. However, if at any time it appears to us that we would like to use your personal data in a way which means that we would need your consent then we will explain to you what we want to do and ask you for consent. This is most likely to be where we are involved in activities which are not really part of our job as a Trust but we are involved because we think it would benefit our students. If you give your consent, you may change your mind at any time. If we think that you will not understand what we are asking then we will ask your parent or carer instead. Usually, we will involve your parents even if you can make your own decision.

HOW WE COLLECT AND STORE THIS DATA

We collect student information via student registration forms and Common Transfer Files (from the Local Authority or previous schools attended) through secure file transfer.

Student data is essential for the schools' operational use. Whilst the majority of student information you provide is mandatory, some of it is requested on a voluntary basis. In order to comply with the data protection legislation, we will make it clear at the point of collection whether there is a legal requirement for you / your parents to provide it, whether there is a legal requirement on the Trust to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided and what you need to do if you do not want to share this information with us.

We hold student data securely for the set amount of time shown in our data retention schedule. For more information on how we keep your data safe please see the Data Retention Policy, available on the GLT website.

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DATA SHARING

We routinely share student information with:

- Schools
- Local Authorities
- Youth Support Services (students aged 13+)
- The Department of Education (DfE)
- Assessment Tracking software providers
- Disclosures connected with SEN support
- CAMHS
- School Counsellor
- School Nurse
- NHS
- School Gateway
- Satchel One
- SIMS
- Applicaaa for Admissions+

Why we regularly share 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.

It is in the vital interest of our students for personal information to be shared with the services listed above. All data is transferred securely.

Before students are old enough to understand we will ask parents to consent. We will ask for students to consent once they reach the age of 13. This is because the law requires us to ask students if they can understand. Normally, we involve parents too.

Youth Support Services

Once our students reach the age of 13, we also pass student information to our local authority and/or the 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
- Career Advisers

Your parent or guardian can object to any information in addition to your name, address and date of birth being passed to their local authority or provider of Youth Support Services by informing us using the contact details above.

This right is transferred to you once you reach the age of 16.

Data is securely transferred to the Youth Support Service.

Please see the Surrey County Council Privacy Notice for more details about how data is stored and

how long it is held for: [Services for Schools Portal – Privacy Notice](#)

Students aged 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

Once you reach the age of 16 you can object to only your name, address and date of birth being passed to the local authority or provider of Youth Support Services by informing us.

Data is securely transferred to the Youth Support Service. For more information about services for young people, please visit our local authority website.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in limited circumstances.

Students will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

Local Authorities

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under

- the [Schools Admission Code](#), including conducting Fair Access Panels.

RIGHT OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Under GDPR, parents and students have the right to request access to information about them that we hold. If you want to request information, please see our Subject Access Request Procedures, for the procedures we take. These are available on the GLT website. 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).

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/>

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

SECURITY

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). In addition, we limit access to your personal information to those third parties who have a business need to know.

You can find further details of our security procedures within our Data Breach Procedure and our Cyber Security Procedure, which can be found on the GLT website.

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.

Withdrawal of consent and the right to lodge a complaint

In the limited 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 Nathan Smith-Rogers. 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.

We hope that Mr Smith-Rogers can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) for GLT 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 Nathan Smith-Rogers, 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

Web: www.judiciumeducation.co.uk

Lead Contact: Craig Stilwell

How Government uses your data

The student data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.

- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

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>

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in 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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

Sharing by the Department of Education

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website:

<https://www.gov.uk/government/publications/dfe-external-data-shares>

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

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

Contact

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Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

Lead Contact: Craig Stilwell

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 16 Dec 2022.