

	<p>Privacy Notice – Data Protection Act 2018</p> <p>PARENTS – September 2023 Issue</p>
---	--

Under Data Protection Law, individuals have a right to be informed about how the school uses any personal data that we hold 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.

This privacy notice explains how we collect, store and use personal data about our **students**.

It is issued in hard copy upon first admission to the school. Thereafter, updates are posted on the school website.

Ruislip High School is part of Vanguard Learning Trust, which is a registered ‘data controller’ for the purposes of Data Protection law. The Trust has a central Data Protection Policy, a copy of which can be obtained from the Trust website ([www.vlt.org.uk](http://www.vlt.org.uk)).

Each School within the Trust has appointed a Data Protection Lead (DPL) who is your first point of contact for any queries or subject access requests.

The DPL for Ruislip High School is Richard Gould, Senior Leader.

The school is also required to appoint a **Data Protection Officer**. Your DPO is:

Miss Karen Williams, Business Manager, [kwilliams@vynersschool.org.uk](mailto:kwilliams@vynersschool.org.uk), 01895 234342

### **The personal data we hold**

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

- Student, parent and emergency contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests, including progress checks
- Curriculum records, such as options choices.
- Characteristics, such as ethnic background, religion, eligibility for free school meals, or special educational needs
- Exclusion / behaviour information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV footage captured in school

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

The School no longer asks parents to supply information about their country of birth, nationality or national identity. This information was originally requested at the request of the Department for Education. The school has deleted this data from its management information system for existing students.

### **Why we use this data**

We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care and protect student welfare
- Facilitate student participation in extra-curricular and enrichment activities
- Assess the quality of our services
- Administer admissions waiting lists
- Comply with the law regarding data sharing

### **Our legal basis for using this data**

We only collect and use students' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest (ie. it is needed to facilitate the effective education of your child)

Less commonly, we may also process students' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Where you have provided us with consent to use your data, you may withdraw this consent at any time by contacting your DPL in writing (or by email).

### **Collecting this information**

While the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible implications of not complying.

### **Right to withdraw consent**

Where we have got permission to use your data, this consent may be withdrawn at any time by contacting Miss Williams. Parents are advised that, under the legislation, students have a legal right to control their own personal data once they are old enough to understand their rights. This is

usually around age 14 years, but will vary from person to person. The school is conscious of the need to balance the rights of students, with the necessity to ensure that parents remain informed about their child's wellbeing and educational progress. Students continue to be legal minors (regardless of these rights), and the school will not allow students to use the Data Protection Act to withhold information which it is reasonable (or indeed legally necessary) for a parent to receive.

### **How we store this data**

We keep personal information about students while they are attending our school. In order to continue to comply with our legal obligations, we will retain some of the information once your child has left. Information will be destroyed in accordance with the Information and Records Management Society's Record Retention Guidelines (a copy of which is available on the school website and may be requested from the DPL).

### **Data sharing**

We do not share information about students 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 data protection law) we may share personal information about students with:

- The **London Borough of Hillingdon** – to meet our legal obligations to share certain information with it, such as safeguarding concerns, school admissions, student exclusions and student destination data at the end of Year 11 and 13
- The **Department for Education** and **Ofsted** - to meet our legal obligations to share certain information with it in relation to student progress and to facilitate the statutory inspection of state schools
- Those with parental responsibility for the student and any other nominated family representatives
- Other educational providers or third party organisations - to facilitate the provision of extra-curricular activities and cross-school activities. This will be the case, for example, for post-16 students studying as part of the 4H Consortium
- **Examining bodies** – in order to facilitate the entry of our students into public exams
- Suppliers and service providers – particularly **Parentpay, RM, Atomwide, Capita Sims** and **Herts for Learning** to enable them to provide the service we have contracted them for, such as the provision of our cashless catering and management information system. **London Grid for Learning (LGFL)** supplies our free school meal eligibility checker.
- Our Payroll Bureau (currently **SGW Payroll**) and **HMRC** – to facilitate payments to students who undertake paid work for us
- The **Health and Safety Executive** – to comply with our statutory obligation in relation to accident and RIDDOR reporting
- Security organisations – in particular **Select Systems** who service our CCTV system
- The emergency services (Police, Fire, Ambulance) – where information needs to be shared for safeguarding reasons or to provide assistance to a student. In all but emergency situations, the school requires requests for information in writing from the police.

The school will facilitate access to a range of online tools in order to support the learning of our students. These include, but are not limited to: GCSEPod, Pixl, Kerboodle, My Maths, Maths Watch and Alps. In order to create accounts, we may need to share a specific range of data to support students' learning. If we wish to share further information we will obtain informed consent.

The school uses G Suite for Education (from Google) to support the delivery of education. Students will be routinely issued with a google email account, access to google calendar, restricted access to YouTube and access to Google Classroom. The Privacy Notices for this suite of products can be separately accessed via the following link : [https://edu.google.com/intl/en\\_uk/trust/](https://edu.google.com/intl/en_uk/trust/).

The school will also routinely put information into the public domain in order to congratulate students on their individual achievements. Such information may include photographs included in the school prospectus and other marketing information, pictures of learning taking place around the school, references on the school's facebook, instagram and twitter accounts, information supplied via regular school newsletters, names in concert programmes etc. The school will, in all cases, remain conscious of its safeguarding responsibilities and will not share any personal information which will put a child at risk.

### **Photographs / film footage of students**

The school will routinely take and retain a photograph of every student in the school. This will be stored securely on our management information system (SIMS) and made available internally to staff to facilitate the delivery of education.

The photographs are taken and supplied by the school's external photographer– who has provided the school with the required evidence that they are GDPR compliant.

In order to facilitate the external assessment of students in some subjects (particularly drama and performing arts), the school is required to take film footage of assessed performance, and to supply this to exam boards for moderation.

The school respects the right of parents, and students, to object to photographs being used to promote the school. All parents will be asked to specifically let us know whether they are happy for photographs of their child to be used for publicity / marketing purposes, as part of the admissions process for joining the school.

Under the Data Protection Act 2018, students aged 13 and over have the right to consent in their own right to the processing of their data, including photographs. A separate privacy notice has been prepared for students and the school will deliver some awareness training to students on data protection as part of its PSHE curriculum.

Whilst students aged 13 and over have the right to consent to their photographs being taken and used, the school respects that some parents feel strongly on this issue. Where parents and students take a different view on whether photographs can be taken and used to promote the school, the presumption will be in favour of photographs not being taken or used. In such a situation, parents and students will be asked to discuss the issue at home.

### **National Pupil Database**

We are required to provide information about students to the Department for Education as part of statutory data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data.

You can also contact the Department for Education with any further questions about the NPD.

### **Youth support services**

Once our students reach the age of 13, we are legally required to pass on certain information about them to the London Borough of Hillingdon, as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/guardians can contact the DPL to request that we only pass the individual's name, address and date of birth to the London Borough of Hillingdon in connection with these services. This right passes to the child once they reach the age of 16 years.

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with Data Protection Law.

### **Parents' and students' rights regarding personal data**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/guardians can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 13), or where the child has provided consent. Where parents wish to make a request for a child aged 13 and over, the school will routinely ask for evidence of the child's consent to provide this data.

The school has prepared a Privacy Notice for students, which will be issued to all students at the start of Year 9, making them aware of their data protection rights. This document is downloadable from the school website.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them personally.

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 how long we will keep it for
- 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, and any consequences of this
- Give you a copy of the information in an intelligible form

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 the DPL.

Parents in maintained schools are entitled to a copy of their child's educational records under the Education (Pupil Information) (England) Regulations 2005. This provision does not apply to academy schools. Ruislip High School however considers it is in the best interest of students to ensure that parents are well informed about the educational experience and progress of their child.

Information will therefore be provided to parents, or those with parental responsibility, on a voluntary basis, so long as such disclosure does not otherwise conflict with the provisions of the DPA 2018, including the subject access rights of the student themselves.

### **Other rights**

Under Data Protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the DPL.

### **Complaints**

We take any complaints about our collection and use of personal information very 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.

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

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

*This notice is based on the Department for Education's model privacy notice for students, amended for parents and to reflect the way we use data in this school.*

---