1. The categories of pupil information that we process include:

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Safeguarding information (such as court orders and professional involvement)
- Special educational needs (including the needs and ranking, care or support plans)
- 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 EYFS framework, KS1 and phonics results, KS2 SATs, GCSE results, post 16 courses enrolled for and any other relevant results)
- Behavioural information (such as consequence and points systems, exclusions and any relevant alternative provision put in place)
- Post-16 information (such as destinations data and college applications)
- Biometrics (used for uniquely identifying a person for school lunch payments)
- Photographs (for internal safeguarding and identification/security purposes, teaching and learning and promotional purposes)
- CCTV images
- Financial information (such as payment systems)

2. Why we collect and use this information.

We collect and use pupil information, for the following purposes:

a) to support pupil learning
b) to monitor and report on pupil attainment progress
c) to provide appropriate pastoral and medical care
d) to provide alternative payment options
e) to provide pupils with opportunities outside of school
f) to assess the quality of our services
g) to keep children safe
h) to meet the statutory duties placed upon us for Department for Education (DfE) data collections

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are defined under Article 6 and Article 9.

Under Article 6, the following lawful bases apply:

Processing shall be lawful only if and to the extent that at least one of the following applies:

a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

b) Processing is necessary for compliance with a legal obligation to which the controller is subject.

c) Processing is necessary in order to protect the vital interests of the data subject or of another natural person.

d) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Article 9 of the GDPR states

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation shall be prohibited.

In addition, where we are processing special category data, the following conditions apply:

a) The data subject has given explicit consent to the processing of those personal data for one or more specified purposes

b) Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law

c) Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent

d) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1)

Article 7 – Consent

Where we have obtained consent to use pupil’s personal information, we will keep a record of this consent; this consent can be withdrawn at any time.

3. How we collect pupil information.

We collect pupil information via registration forms at the start of the school year, Common Transfer File (CTF) or secure file transfer from a previous school.

Pupil data is essential for the schools’ operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is 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 pupil information to us or if you have a choice in this.
4. How we store pupil data.

We hold pupil data securely for the set amount of time shown in our data retention schedule. We use secure servers and take all other appropriate measures to ensure that the personal information that you disclose to us is kept safe and confidential. For more information on our data retention schedule and how we keep your data safe, please refer to our policies.

5. Who we share pupil information with.

We routinely share pupil information with:

- Schools, colleges and universities that the pupils attend after leaving us
- Our local authority
- The Department for Education (DfE)
- Ofsted
- Examination boards
- Youth support services
- The health authorities e.g. school nurse
- Police forces and the judicial system
- Professional advisers and consultants
- Suppliers and service providers to enable them to fulfil an educational contract

6. Why we share pupil information

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

Youth support services

We may share information with youth support services when referrals are made to provide help and support to our pupils.

This data is transferred to the youth support service via secure email. It is also stored in a locked filing cabinet and held until the pupil’s 25th birthday.

Once our pupils reach the age of 13, we also pass pupil information to 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:

- careers advisers
- post-16 education and training providers
For careers and post-16 information, data is securely transferred to the local authority via a secure portal and is stored securely by the local authority.

The information shared with the youth support services is limited to the child’s name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

For more information about services for young people, please visit our local authority website.

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.

7. Requesting access to your personal data

Under data protection legislation, parents and pupils 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 Pastoral Team Manager or Data Protection Officer on 01709 850471.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- A right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint 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/

8. How the Government uses your data

The pupil 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)

9. 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

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

To contact the DfE: https://www.gov.uk/contact-dfe
9. Contact at Thrybergh Academy

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

Data Protection Officer
Thrybergh Academy & Sports College
Arran Hill
Rotherham
S65 4BJ
Tel: 01709 850471
Email: gdpr@thrybergh.com