



Southend High School for Girls

# GDPR Privacy Statement

Last reviewed: May 2018

To be reviewed: Ongoing

# GDPR Privacy Statement

**Data is held about our:- Students, their Parents and the Next of Kin of Students, our Staff and their families, Individuals and Firms that supply materials or services to the school, Contractors engaged in the supply or delivery of service contracts agreed with the school.**

## Why we collect and use data?

We, **Southend High School for Girls Academy Trust (SHSG)** are a **Data Controller** and **Processor** for the purposes of the **Data Protection Act 1998 (DPA)**. SHSG is registered with the Information Commissioners Office (ICO) under Registration No Z2544750. The **General Data Protection Regulation (GDPR)** is an EU law with many similarities to DPA and compliance with the GDPR becomes mandatory after 25<sup>th</sup> May, 2018.

We collect data about our students, their parents, trainee teachers, our staff, and various suppliers, (**Data Owners**) and hold it in electronic and/or paper format in secure locations. Information held may be obtained from our students, their parents (or carers), our staff and suppliers. We may also receive information about students from various sources including: - their previous school, the Learning Records Service and the Consortium of Selective Schools in Essex. Nominated referees are frequently asked to submit reference reports about our staff and suppliers.

We hold the data and use pupil, staff and supplier information for compliance with the legal obligations to which the Academy is subject and for the legitimate educational interests pursued by the Academy. (EU GDPR Article 6:C and EU GDPR Article 9:f).

In registering a student at the Academy explicit consent to the processing of data to support the education of the student is given by parents (or students reaching age 18). (EU GDPR Article 9:2) With effect from 25<sup>th</sup> May, 2018 data will also be processed in accordance with the special category applicable to education specified in the GDPR.

Processing is necessary to protect the interests of students and staff and is carried out in the course of legitimate educational activities with appropriate safeguards. (EU GDPR Article 9:C and EU GDPR Article 9:D).

The school will not use data held about students and their parents or carers for marketing purposes without first obtaining parental consent to do so. Parents will be invited to agree to receive school newsletters in which forthcoming school events are listed and given a choice as to whether they wish to receive such correspondence by e:mail or letter. Correspondence promoting school events can only be sent to parents who opt-in to receiving these notifications. Parents will be provided with the ability to “unsubscribe” from receiving electronic versions of the school’s “Highlights” newsletter and Gazette.

The school is committed to using third parties and software suppliers who are compliant with GDPR.

## **We use pupil and trainee teacher data:**

- To support student learning
- To safeguard and protect students
- To monitor and report on student progress
- To provide appropriate pastoral care
- To assess and improve the quality of our service delivery and provision

- To comply with the law regarding data sharing
- To enable us to comply with health and safety legislation
- To enable us to operate an effective student support and catering operation and to apply appropriate medical attention in an emergency
- To enable us to enter students in to public examinations
- To be able to account for students and to contact family members in the event of an emergency
- To enable us to report on matters of diversity

**Information that the Academy collects, holds about pupils and trainee teachers includes:**

- Personal contact information, e.g. name, Unique Pupil Number (UPN), address, date of birth
- Characteristics, e.g. ethnicity, language, nationality, country of birth, Free School Meal eligibility, (FSM), gender, religion
- Attendance record information, e.g. sessions attended, absences, reasons for absence
- Assessment and attainment information (marks) from internal and external assessments, including Post 16 Learning Data
- Rewards and sanctions, e.g. number of merits or sashes, detentions and behaviour data
- Relevant medical information such as allergies and ailments
- Information about students' Special Educational Needs, Disabilities (SEND), and English as an Additional Language provision, (EAL)
- Copies of written and electronic communication with parents
- Notes from meetings
- Fisher Family Trust and Southend Borough Council (SBC) analysis data
- CCTV images
- Meal choices
- Trips and visits attended outside school
- Photographs of activities and trips

**In all cases Confidential Data stored by the Academy about an individual is obtained freely, specifically needed, informed and unambiguous.**

The Academy will inform parents whether data is a mandatory requirement or if parents have a choice whether to supply it.

We use data held on staff files:

- To determine an individual's suitability for employment
- To facilitate payment of : - salaries, taxation, National Insurance and pensions
- To safeguard and protect staff
- To monitor and report on staff progress, absence and illnesses
- To comply with the law regarding data sharing
- To enable us to report on matters of diversity, gender, religion,
- To enable us to comply with health and safety legislation
- To enable us to operate an effective catering operation
- To determine whether individuals are qualified to drive our minibus
- To be able to account for staff and to contact family members in the event of an emergency
- To be able to complete DBS checks

**Information that the Academy collects, holds about staff and their families includes:**

- Personal contact information, e.g. name, address, telephone numbers, e:mail addresses, date of birth, next of kin name and contact number
- Characteristics, e.g. ethnicity, language, nationality, country of birth, gender
- Qualifications and CV details

- salary, allowances, pension, expenses reimbursement,
- Attendance record, absences, reasons for absence, disciplinary records
- Passport and driving licence, copies of identity papers held temporarily and used for CRB clearance
- Photographs
- Annual appraisal reports
- Bank details,
- Taxation, tax code, and NI number
- CCTV images

### **With whom do we share information**

**SHSG will not provide information about any individual to anyone outside the school without consent unless the law and our rules permit us to do so.**

**The Academy does share information on pupils, trainee teachers and staff as appropriate with:**

- The Department for Education, (DfE) e.g. School Census
- Examination Boards (Examination candidates must be advised and aware that relevant personal data will be transferred to the awarding body for the purpose of examining and awarding qualifications.)
- The Consortium of Selective Schools in Essex (CSSE)
- WG, DE, The Skills Funding Agency, Regulators, HESA, UCAS
- Parents of students
- HEI/FE
- Potential Employers
- In references
- The Police
- The NHS
- Embassies of countries for foreign travel
- 11+ marking/in-house applications
- Provider's of software such as: - Parent Pay, Capita SIMS, Softlink for the library, Nationwide Services Ltd for Cashless catering, ECC for payroll / HMRC / NI / Teachers Pensions Service / the Local Government Pension Service / Alfie and Fronter.
- Our Auditors
- Schools that students attend if they leave SHSG
- The Local Authority of the school and of the residence of the student
- NHS/School Nurse/Counsellor as appropriate
- Travel companies for trips abroad
- Duke of Edinburgh and World Challenge administrators
- Arts Award, Sports Leaders award administration with permission
- Fisher Family Trust (FFT for assessment of student attainment)
- Press releases with permission
- For pupils in KS4 the Learning Records Service allocates each student a unique learner number and may also give data relating to a student's learning or qualifications.

General information about suppliers will be released to other schools interested in purchasing goods and services in response to reference requests and in order to prevent fraudulent transactions.

### **Where is our data stored? And how is it deleted?**

Paper information is kept in offices and our locked archive store. When not in use it is the policy of the school that confidential data should be stored in locked filing cabinets. Paper files on

students and staff is shredded seven years after a student or member of staff has left the school. Only material relating to safeguarding incidents is kept in paper format beyond this time as required by various authorities.

All electronic data is held securely and shared only for the legal purposes of the Academy and/or for statutory purposes. All student and staff files are password protected and are also guarded by the schools anti-virus software. The school has Gateway servers and a Firewall on our internet connection.

Capita Plc provides school management software to the vast majority of schools and academies within UK. SHSG has demanded that Capita provides schools with the means to delete student and staff records. At the time of writing this is only possible on a per student or "per field" basis. Capita has indicated that it will provide the ability to delete wholesale records towards the end of 2018.

In accordance with guidelines issued by the ICO student data will be kept for 7 years after leaving so at age 25 for a year 13 student. *After this time all data except for the student name, DOB and public examination results will be deleted in line with the data protection law/school policy. The information retained will only be used by the school to respond to requests from ex-students and their potential employers for confirmation of their public examination results.*

All data is backed-up in a secure Cloud site. Financial data is securely stored on Capita Financial Management Software. This is also backed-up to the cloud and to our secure archive. Communication is stored on email, Edmodo and Fronter.

Photographs from the 11+ test are stored on the school IT system and deleted after one year. Whole school photographs going back 100 years are displayed on a "photo wall" in the school.

Thumb and finger print records of students and staff used for meal identification purposes are deleted once the individual has been marked as "left" on the school's SIMS database and kitchen staff have run a "rebuild biometric controller" operation which is performed daily during term time. Meal selection records are removed by the school requesting that our software provider (Nationwide Retail Systems Ltd. "Nationwide") archives obsolete records.

Supplier records are maintained: - in order to be able to place orders for goods and services, to contact suppliers about their products and services, to facilitate benchmarking of products and prices, to facilitate payments for goods supplied, to maintain records of goods purchased and under warranty. Supplier data is reviewed annually and records are deleted if it is unlikely that they will be re-engaged.

CCTV images from internal and external cameras are recorded around the clock at SHSG. The records are overwritten automatically when the data discs are full, (usually monthly). Teachers and staff have remote access to SIMS data through SIMS Learning Gateway and their work files stored in Office 365. A limited number of staff have access to files through their telephones and laptops via SIMS Teacher App. All school laptops taken offsite are secured with a high level of encryption.

### **Why we share information about our students and staff**

SHSG does not share information about students or staff at SHSG without consent unless the law or our policies allow us to do so.

SHSG shares student data with the Department for Education (DfE) and the Local Authority on a statutory basis. This data sharing underpins school funding, educational assessment and attainment, and safeguarding. The Academy is required to share information about our students

with the DfE under regulation 5 of The Education (information about Individual Pupils) (England) Regulations 2013.

For more information on the data collection regulations placed on us by the DfE, e.g. school census go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Information is passed to the Local Authority as the Provider of Youth Support Services since they have a responsibility in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996. This enables the Local Authority to provide Youth Support and Careers Advice.

A parent/guardian can request that only their child's name, address and date of birth is passed to the Local Authority by informing us. This right is transferred to the student once they reach age 16.

SHSG will continue to share certain information about students aged 16+ with the Local Authority as the Local Authority has responsibilities under section 507B of the Education Act 1996, enabling them to provide: -

- Post 16 education and training
- Youth Support Services
- Careers Advisers

For more information please visit Southend Borough Council's website.

#### **[The National Pupil Database \(NPD\)](#)**

The NPD is owned and managed by the DfE and contains information about pupils and students in England. It provides reports on educational performance to inform research, as well as studies commissioned by the department. It is held in electronic form for statistical purposes. This information is collected from a range of sources including schools, Local Authorities and awarding bodies.

The Academy is required by law to provide information to the DfE as part of statutory data collections such as the school census. Some of this information is then stored in the NPD. Ref: Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more go to:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

The DfE may share information about our students from the NPD with third parties who promote the education and well-being of children in England by:

- Conducting research and analysis
- Producing statistics
- Providing information, advice and guidance

The DfE has robust processes in place to ensure that the confidentiality of the data is maintained and that there are stringent controls in place regarding access and use of data. Decisions relating to the release of data to a third party are subject to strict approval on a detailed assessment of:

- Who is requesting the data
- The purpose for which the data is required
- The level and sensitivity of the data requested; and
- Arrangements in place to store and handle the data.

To be granted access to student information, organisation must comply with strict terms and conditions covering confidentiality and handling of data, security arrangements and retention and use of data.

For more information visit:

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

**Individuals and Companies may Request access to data held about them by submitting a Subject Access Request**

Under data protection legislation, pupils (and their parents,) and staff have the right to request access to the information we hold about them. To make a **Subject Access Request** (SAR) please contact Mrs Clarke, the Academy's Data Protection Officer [aclarke@shsg.org](mailto:aclarke@shsg.org). (Students aged 13 years or older may request their own information.)

Individuals also have the right to:

- Object to processing personal data that is likely to cause, or is causing damage or distress
- Prevent processing for the purpose of direct marketing
- Opt "out" of receiving unwanted newsletters and documents distributed electronically by e:mail
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the data protection regulations.

If you have any concerns about the way we are collecting or using information please contact the Academy's Data Protection Officer [aclarke@shsg.org](mailto:aclarke@shsg.org) (Mrs A Clarke) in the first instance, or the Headteacher, or directly to the Information Commissioner's Office at <https://www.ico.org.uk/concerns>

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