



KNAPHILL FEDERATION OF SCHOOLS

Privacy Notice (How we use pupil information)

Knaphill Federation of Schools (Knaphill School and Knaphill Lower School) is committed to protecting the privacy and security of personal information. This privacy notice explains how we collect, store and use personal information about pupils, in accordance with the General Data Protection Regulation (GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Who Collects This Information

Knaphill Federation of Schools is the “data controller” for the purpose of data protection law. This means that we are responsible for deciding how we hold and use personal information about pupils.

The Categories of Pupil Information That We Collect, Process, Hold and Share

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

- Personal information such as name, unique pupil number, date of birth and identification documents;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Safeguarding information (such as court orders and professional involvement)
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Exclusion information;
- Performance and assessment information (such as Key Stage and Phonics results);
- Behavioural information (including exclusions and any relevant alternative provision put in place);
- Special educational needs information including care packages, plans and support providers;
- Details of any medical conditions, including physical and mental health;
- Special categories of personal data including biometric data, ethnicity, relevant medical information;
- Images of pupils engaging in school activities, and images captured by the School’s CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Photographs and Videos

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

Collecting This Information

Whilst the majority of 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 pupil information to us or if you have a choice in this.

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.

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How We Use Your Personal Information

We hold and use pupil data for: -

- Pupil selection (and to confirm the identity of prospective pupils and their parents);
- Administration of admissions waiting list;
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;
- Assessing performance and to set targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Supporting teaching and learning;
- Giving and receiving information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- Carrying out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring the use of the school's IT and communications systems in accordance with the school's IT security policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including obtaining appropriate professional advice and insurance for the school.

The Legal Basis on Which We Use This Information

We will only collect and use pupils' information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law;
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

We need all the categories of information in the list above to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is requirement or permitted by law.

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Sharing Data

We will not share information about pupils 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 pupils with:-

- The Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Ofsted;
- The Local Authority-to meet our legal obligations to share certain information with it, such as safeguarding concerns, exclusions and funding;
- Other schools within the Federation;
- Other schools that pupils have attended/will attend;
- The pupil's family and representatives;
- NHS;
- Health and social welfare authorities/organisations – to meet our legal obligations to share certain information with them, such as health and wellbeing/safeguarding concerns;
- Law enforcement officials such as Police, HMRC;
- Local Authority Designated Officer;
- Professional Bodies such as lawyers, consultants and examining boards;
- Suppliers and Support service providers (including insurance, IT support, information security);
- Financial organisations;
- Charities and Voluntary organisations;
- Survey and Research organisations;
- Our Auditors.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

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.

Why We Share This Information

We do not share information about our pupils with anyone without consent unless otherwise required by law. For example, we share student's data with the DfE on a statutory basis which underpins school funding and educational attainment. To find out more about the data collection requirements placed on us by the DfE please go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Storing Pupil Data

The Knaphill Federation of Schools keep information about pupils on computer systems and sometimes on paper.

Except as required by law, the School only retains information about pupils for as long as necessary in accordance with timeframes imposed by law. Our records retention schedule sets out how long we keep information about pupils.

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Our records retention schedule is held as an appendix to our Data Protection Policy, a copy of which can be requested by contacting DataEnquiry@kfos.co.uk.

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).

The National Pupil Database

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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

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

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

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

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

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

For information about which organisations the Department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

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

Requesting Access to Your Personal Data

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Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a '**subject access request**' for your personal information, or be given access to your child's education record contact DataEnquiry@kfos.co.uk

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 purposes of direct marketing;
- 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 want to exercise any of the above rights, please contact DataEnquiry@kfos.co.uk.

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). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In 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 DataEnquiry@kfos.co.uk.

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.

Contact

If you would like to discuss anything within this Privacy Notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern by emailing DataEnquiry@kfos.co.uk in the first instance.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information then you can contact the DPO on the details below: -

Data Protection Officer Name: Craig Stilwell

Data Protection Officer Details: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE

Data Protection Officer Email: dataservices@judicium.com

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.