

## Privacy Notice (How we use pupil information)

Under the requirements of the General Data Protection Regulation and data protection legislation, **Central Foundation Boys' School** is subject to a variety of obligations as the data controller of personal data (information) about pupils and their parents, carers and families.

Personal data is information that identifies you and your child and is about you and your child. This personal data might be provided to us by you, or provided by someone else (for example another school) or it could be created by the school.

This notice explains what personal data we hold about you and your child, how that information is collected, how we use and may share information about you and your child. Our Data Protection Officer is **Agata Obirek**.

### The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address, biometric data)
- 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 national curriculum assessment results and reports on pupil progress and attainment)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- photographs, images, audio/visual recordings and CCTV\*
- information regarding parent/carer status such as looked after children, previously looked after child and special guardianship status
- information relating to needs whilst participating in trips and activities
- parental consent information

### Why we collect and use pupil information

The personal data collected is essential for the school to fulfil its official functions and meet legal requirements.

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

- a) to support pupil learning and educational provision
- b) to monitor and report on pupil attainment progress
- c) to moderate teacher assessment judgments
- d) to provide appropriate pastoral care and support services
- e) to assess the quality of our services
- f) to keep children safe (food allergies, or emergency contact details)
- g) to safeguard children and young people
- h) to reduce the incidence of children missing education

- i) to support children at risk from permanent exclusion
- j) to support secondary and in-year admissions process
- k) to meet the statutory duties placed upon us by the Department for Education

We will not use your child's personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for that processing.

## **The lawful basis on which we use this information**

In most situations we collect and use pupil information because the processing is necessary for compliance with a legal obligation to which the school, as data controller, is subject, or in the exercise of official authority in our capacity as a school.

In particular, we collect and use personal information under section 537A of the Education Act 1996 and under section 83 of the Children Act 1989, to provide information to the Secretary of State and to carry out tasks in the public interest.

If we need to process 'special category data', we rely upon reasons of substantial public interest, for example promoting and securing equality of opportunity and eliminating discrimination. If special category data is processed for any other reason, you will be informed of the additional legal basis for this.

If there is processing or sharing that relies upon your consent, we will make this clear to you and ensure that we seek your consent. You will always be able to withdraw your consent at any time.

## **Collecting pupil information**

We collect pupil information via registration forms and student induction packs at the start of the school year, the Common Transfer File (CTF) as part of the student admission process and secure file transfers from the student's 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 data protection legislations, 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 and we will tell you what you need to do if you do not want to share this information with us.

## **Storing pupil data**

We will always hold personal information about you and your child securely and in accordance with the law. This will be held securely on IT systems such as SIMS and on our secure servers. We also work with our suppliers who provide outsourced educational software and databases to ensure they adhere to and are compliant with GDPR requirements.

We will retain and delete information in accordance with the School's Records Management Policy / retention policy and as otherwise required by the General Data Protection Regulation and data protection legislation in force from time to time.

CCTV Recordings are held securely on 3 dedicated NVRs (Network Video Recorders) within the Premises office. The recordings are held on the NVRs for up to 31 days, after which the recordings will be overwritten with new CCTV Data.

## Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- the NHS – i.e. school nurse or Whittington Health NHS Trust
- Camden & Islington Public Health
- Islington social care and health services
- where the pupil is not resident in Islington, with their respective local authority
- Ofsted, Ofqual
- Examination boards including AQA, Edexcel, OCR, and WJEC
- Islington Sixth Form Consortium (IC6) partner schools including Highbury Fields and City of London Academy Trust (covering City of London Academy Highbury Grove and City of London Academy Islington).
- Providers of education software to support our teaching and learning, and other suppliers and services providers that need pupil data to enable them to provide the contracted services. We ensure that this information is held securely under the contract we hold with these suppliers

## Why we regularly 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.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you.

Sharing of data is carried out using Egress, secure data sharing software. Limited staff have access to this use this software for sharing data outside the school intranet and secure software such as SIMS and Dynamic Progress Reporting for example.

## Youth support services

### Pupils aged 13+

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:

- youth support services
- careers advisers

A parent or guardian can object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once they reach the age 16

Data is securely transferred to the youth support service via the same Egress software platform.

Internally, pupil information is saved on the school's secure servers and in paper copy in a locked archive room within the school for **a period of 25 years, (35 years in the case of SEN data) from date of birth.**

## Pupils aged 16+

We will also share certain information about pupils 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

A child / pupil once they reach the age of 16 can object to only their name, address and date of birth is passed to their local authority or provider of youth support services by informing us.

Data is also securely transferred to the youth support service via **Egress** and is stored the school's secure servers and in paper copy in a locked archive room within the school for **a period of 25 years, (35 years in the case of SEN data) from date of birth.**

For more information about services for young people, please visit our local authority website: <https://www.islington.gov.uk/children-and-families/young-people>

## Department for Education

We regularly share pupil data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

The 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 DfE either directly or via our local authority for the purpose of those data collections, under:

### School census:

section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

### Progress and attainment

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.

- all other statutory functions/duties that the local authority is bound by. These are mostly regulated by sections of the Education Acts

## Requesting access to your personal data

Under GDPR, 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 **Agata Obirek, CFBS Data Protection Officer** on **info@cfbs.islington.sch.uk**.

Depending on the lawful basis above, you may 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 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.

## Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting **Agata Obirek, CFBS Data Protection Officer** on **info@cfbs.islington.sch.uk**.

## 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 on **23/02/21**.

## Contact

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

**Agata Obirek**

**Data Protection Officer**

**Central Foundation Boys' School**

**Cowper Street EC2A 4SH**

**info@cfbs.islington.sch.uk**

## How 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)

## 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>

## 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>