

## **PRIVACY NOTICE FOR PUPILS ATTENDING Rye College (the School)**

### **PART OF THE AQUINAS CHURCH OF ENGLAND EDUCATION TRUST (The Trust)**

#### **Why we use pupil information**

The Trust and the School collect a lot of data and information about pupils attending the School so that it can run effectively as a school and safeguard pupils and so the Trust can meet its other legal responsibilities such as school admissions. We do so in accordance with the law that allows us to collect this information and tells us how we can use it.

As you are considered old enough to make decisions in relation to your own personal information this privacy notice is being provided to you. It explains how and why we collect information about you, what we do with it and what rights you have in relation to the personal data and information collected about you. Although we are not required to advise your parents of the details of this privacy notice, we wish to take a collaborative approach and so a copy of this notice will also be provided to your parents/ guardians.

In this notice, you will see different names or terms used that you may not be familiar with, such as:

- **Data controller:** This person (or group of people, like a school) is in charge of the information we collect.
- **Data processor:** This person processes information for us.
- **Data protection officer (DPO):** This person makes sure we do everything the law says. The Trust's DPO is Mary Capon.
- **Personal data:** This means any information that can be used to identify you, such as your name, address and date of birth.
- **Special category data:** This is personal data that needs more protection because it is sensitive.
- **Processing:** This is anything we do with your personal data including merely holding it.

#### **How we collect and use pupil information**

The Trust is the data controller of the personal information you or your parents give us or which has come to us from a third party or as a result of you attending the School. We use your personal information in order to meet our responsibility to operate the School and educate you.

Whilst the majority of pupil information you or your parents/ carers provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the data protection legislation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

In most cases we are entitled to process your personal information without your consent. Where this is necessary, we will ask you for your consent such as where we wish to use photos or images of you on the Trust of the School's website or on social media to promote school activities. Consent can be withdrawn at any time. Although parental consent is unlikely to be needed, we wish to take a collaborative approach so we will keep your parents informed when we approach you for consent.

We collect information about pupils when they join the Academy and update it during their time on the roll as and when new information is acquired. We may also ask you to review some of the personal information we hold to ensure that it is accurate.

#### **Why do we collect and use pupil information?**

We collect and use your personal information in the following cases because the data protection law allows us to do so:

- a. where we have your consent;
- b. where it is necessary to comply with other laws;
- c. where it is necessary to protect you or another from harm;

- d. where it is necessary for in order for the Trust and the School to meet our responsibilities of operating the School and educating you.

Where the personal information we collect about pupils is special category personal data, we will only process it where:

- a. we have your explicit consent;
- b. processing is necessary to protect you or another from harm where you are unable to give consent; and / or
- c. processing is necessary for reasons of public interest.

The Trust's Data Protection Policy provides further details of our legal bases for processing your data.

We use your personal information to enable us to run the School, in particular:

- a. to support pupil learning which includes the use of external online learning and homework platforms, assessment tools and systems and additional support where it is considered necessary to support pupil learning;
- b. to promote school life and the associated ancillary services such as catering;
- c. to monitor and report on pupil progress;
- d. to assess pupils in preparation for examinations and review access arrangements for examinations including public exams;
- e. to provide an inclusive education for all our pupils and support those with learning difficulties and health considerations.
- f. to provide appropriate pastoral care;
- g. to assess the quality of our services;
- h. to comply with the law regarding data sharing;
- i. for the safeguarding, protection and welfare of pupils and others in the Academy;
- j. for the safe and orderly running of the Academy;
- k. for the administration and business functions of the Academy.
- l. For external trips and visits where it is necessary to share details with the trips provider/organiser and insurance provider.
- m. To monitor computers to ensure pupil safety through the use of Smoothwall Monitor Services.

**The categories of pupil information that we collect, hold and share include:**

- a. Personal information (such as name, unique pupil number, address, gender and date of birth);
- b. Parent details (such as name, address, telephone number, email, relationship to pupil, occupation (optional), marital status, court orders in place etc);
- c. Characteristics (such as ethnicity, home language (optional), medical conditions, nationality, country of birth (optional), dietary requirements and free school meal eligibility);
- d. Attendance information (such as sessions attended, number of absences and absence reasons);
- e. Admission information (such as application, supplemental information form and registration paperwork);
- f. Emergency contact details;
- g. Medical Information (such as medical condition, medication, dietary requirements in relation to a medical condition or religious belief, internal healthcare plans, doctor's details and hospital details);
- h. SEN and Disability Information (such as EHC plan, internal assessment information to identify SEN and internal educational plans);
- i. Pupil record from previous setting;
- j. Educational information (such as exam access arrangements, examination results, school books, school work, internal assessments using systems which are reviewed by teachers, internal educational tracking data, pupil premium eligibility and free school meals eligibility);
- k. School Report;

- l. Behaviour information (such as incidences of good or poor behaviour, incidences of bullying, exclusions, final warning letter and letters to parents);
- m. Correspondence relating to the pupil with parents and external agencies.
- n. Photographs taken for our information management system which are held on the personal file and on the Academy's information management system and to support the pupils' learning;
- o. CCTV footage.
- p. Username and password for the School's IT systems together with keystrokes undertaken by pupils when using school IT equipment.
- q. Post 16 learning information (such as UCAS, apprenticeships or job applications, references).
- r. Biometric data as a result of operating a cashless catering system
- s. The Academy also uses CCTV cameras around the school site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage involving pupils will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.
- t. Aged 14+ qualifications - For pupils enrolling for post 14 qualifications, the Learning Records Service will give us a pupil's unique learner number (ULN) and may also give us details about the pupil's learning or qualifications.

### **How long will we keep your information and how do we keep it safe?**

We do not keep your information forever, only for as long as we need it. We have rules that tell us when to keep it and when we should safely delete it. You can ask us for these details if you want to.

A significant amount of your personal information is stored electronically but some information will be paper based. Data stored electronically will be saved and backed up by within the Microsoft Azure Cloud Platform. Microsoft Azure Data Centres are located within the UK and Europe. The contracts with these providers contain the necessary provisions to ensure the security of personal information. Measures are also in place to protect data from cyberattacks and ransomware. Personal information held in hard copy format is held in locked files.

Personal information may be transferred to other countries if, for example, there is a school trip to a different country or the pupil is relocating to a different country and joining a new setting abroad. Appropriate steps will be taken to keep the data safe.

### **Who do we share pupil information with?**

Your personal information is shared with staff at the School and the Trust only where it is necessary. Sometimes we may have to share your information with:

- Other schools you may attend;
- our local authority, the London Borough of Bromley;
- Your home local authority (if different);
- the Department for Education (DfE);
- Aquinas Advisory Council members and Trustees;
- exam boards.
- Clubs run by external providers.
- Online learning platforms which are used to support your education.
- Catering providers.
- School Payment System Providers.
- Provider systems for analysing and amalgamating data from across the Trust.

From time to time, we may also share information with third parties including the following:

- External education providers associated with the National Tutoring Programme;
- Careers services;
- the Police and law enforcement agencies;
- health professionals including the school nurse, educational psychologists, specialists to assess and support the special educational needs of pupils and the NHS.
- Education Welfare Officers;
- Courts, if ordered to do so;
- Independent Review Panel;
- Admission Appeal Panels;
- the National College for Teaching and Learning;
- the Joint Council for Qualifications;
- Social Care and other external agencies;
- Prevent teams in accordance with the Prevent Duty on schools;
- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances;
- the Rochester Diocesan Board of Education for the purposes of receiving educational support;
- our HR providers, for example, if we are seeking HR advice and a pupil is involved in an issue;
- our legal advisors;
- the Risk Protection Arrangement;
- The school counsellor;

In the event that we share personal data about pupils with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

### **Why we share pupil information**

We do not share information about you with anyone without consent unless the law allows us to do so. We share information with the Department for Education which includes holding your personal information on the National Pupil Database. Further details of this can be provided if required.

We also share your personal information with youth support services when you are 13 years and from the age of 16 you can request that **only** your name, address and date of birth is shared.

### **Requesting access to your personal data**

You have the right to request access to the personal information we hold about you. This is called a subject access request and should be made to the Trust's Data Protection Officer: Mary Capon by writing to her at Aquinas Trust, Magpie Hall Lane, Bromley BR2 8HZ or emailing her at [info@aquinatrust.org](mailto:info@aquinatrust.org) and inserting 'subject access request' in the subject box.

We have 1 calendar month to respond to such a request. As the School has limited staff resources outside of term time, it would be helpful if such requests could be made during term time.

If you have allowed someone else to make a subject access request on your behalf such as your parents, then you will also need to provide us with written confirmation of such permission.

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
- claim compensation for damages caused by a breach of our data protection responsibilities.

If you have a concern about the way we are collecting or using pupil data, you should raise your concern with us in the first instance by contacting the Trust's data protection officer. Alternatively, you can contact directly the Information Commissioner's Office at <https://ico.org.uk/concerns/>

**Contact:**

If you have any queries regarding this notice or the use of pupil personal information, please contact:

- The Trust's data protection officer, Mary Capon, who can be contacted by writing to her at The Trust's offices are at Magpie Hall Lane, Bromley BR2 8HZ, by emailing [info@aquinatrust.org](mailto:info@aquinatrust.org) or calling 0203949 7000.
- Alternatively, you can contact the headteacher Mr Dom Downes or the Academy's data protection lead Amy Biddle [office@ryecollege.co.uk](mailto:office@ryecollege.co.uk).