

Data Privacy Notice for Pupils and Parents

Reviewed: March 2025

Next Review Due: March 2027

Reviewed by Samantha Roberts, School Bursar & Data Protection Controller

How we use pupil information

Who we are

Windlesham School is a data controller for information about its pupils, their families and its staff. It is registered for this purpose with the Information Commissioner's Office (ICO) under registration number Z3004010.

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

- personal information (such as name, unique pupil number and address).
- characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility).
- attendance information (such as sessions attended, number of absences and absence reasons).
- assessment information and education records.
- Special Educational Needs information.
- behavioural information (such as achievements, exclusions, internal exclusions and detentions).
- health and medical information (such as dietary requirement and medication details).
- safeguarding and Child Protection reports and disclosures.
- photographs and video clips.

Why we collect and use this information

We use the pupil data:

- to support pupil learning.
- to monitor and report on pupil progress.
- to contact and provide information to parents & carers.
- to provide appropriate pastoral care.
- to assess the quality of our services.
- to comply with the law regarding data sharing.

The lawful basis on which we process this information

- We collect and process pupil information under a task performed in the public interest where it relates to a child's educational progression.
- Some photographs and videos are used only after gaining consent.
- Where medical data is being processed, this is processed under a legal obligation (Children and Families Act 2014 which includes a duty on schools to support children with medical conditions)
<http://www.legislation.gov.uk/ukpga/2014/6/section/100/enacted>.
- Safeguarding data is processed under the legal obligation of The Education Act 2002. Sections 21 and 175 detail how governing bodies of schools must promote the well-being of pupils and take a view to the safeguarding of children at the school.

- We collect and process pupil information under Article 6 of the General Data Protection Regulation (GDPR), and the Data protection 2018 (DPA 2108), to perform our official function (public task).

Where we are processing special category data we will be doing so using one of the lawful bases above, and one of the following conditions for processing:

- the data subject has given explicit consent to the processing of the personal data for one or more specified purposes.
- processing relates to personal data which is manifestly made public by the data subject.
- processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.
- 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.

Collecting pupil information

Whilst most of the pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with current 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.

Storing pupil data

We hold pupil data based on the retention schedule provided in the IMRS School Toolkit.

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).
- suppliers that we have contracted with to provide educational services and those related to the operations of the school.

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 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 our local authority (LA) and the DfE under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Data collection requirements

To find out more about the data collection requirements placed on us by the DfE (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The National Pupil Database (NPD)

The NPD is owned and managed by the DfE 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 DfE. 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 DfE may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- Schools
- LAs
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime
Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>
- <https://www.gov.uk/government/publications/dfe-external-data-shares>

How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

Other information we collect and hold

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

- parents' and carers' information (such as name, address, contact information, relationship to the child, involvement with volunteer groups or parents association);
- visitor information (such as name, business, car registration, DBS certification, timings, purpose of visit);
- Governors' information (such as name, address, contact information, business interests, financial interests and governance roles in other schools); and
- volunteers' information (such as name, address, contact information, DBS certification).

Why we collect and use this information

Parents' information is collected so that we can:

- communicate with you about your child (in relation to things such as education and attainment, health and well-being, attendance and behaviour);
- send you important information about the school; and
- provide you with access to tools and services we use in school (such as parent payment systems, communication applications).

Visitors' information is collected so that:

- we have a record of who is and has been in the building, for health, safety and operational purposes;
- we know whether a visitor can be unaccompanied in areas where children are present; and
- we have a record of official visits (such as inspections or maintenance).

Governors' information is collected so that:

- we can communicate with Governors on school business; and
- there is a public record of Governors and their business interests.

The lawful basis on which we use this information

- Parent information is processed in the public interest where it is related to their child's education. We may have a legal obligation to process data in certain processing activities and in some circumstances we will rely on consent as the lawful basis.
- Visitor information is processed as a task in the public interest where it relates to school operations and under a legal obligation where it relates to health and safety.
- Governor information is processed as a task in the public interest.

Collecting this information

- **Parents:** 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 data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.



- **Visitors:** as a visitor the information that you provide to us is voluntary. However, we may restrict access to the school if certain information is not provided.
- **Governors:** 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 data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

Who we share this information with

We routinely share this information with:

- Parents: we will share your information with members of staff, other agencies and, where you have agreed, with third party processors who provide services to the school.
- Visitors: your information will not be shared unless requested by an external agency in the course of a health and safety incident or in the investigation of a crime.
- Governors: we will publish the names, business interests, financial interests and governance roles of governors in other schools on the school website.

CCTV

Purpose

We use CCTV in and around our sites only for legitimate purposes. These are:

- for the safety and security of students, staff and visitors
- to protect buildings and assets from damage, disruption, vandalism and other crime
- to support law enforcement bodies in the prevention, detection and prosecution of crime
- to assist in the defence of any civil litigation, including employment tribunal proceedings

Cameras are used for both recordings of data and live monitoring. Where live monitoring is available we take steps to ensure that there is controlled access to live monitors.

For more information, please see our CCTV policy on the GDPR section of our school website.

Telephony system

Our IP telephony system will record and display the phone number of incoming calls. These details may be stored on individual telephones, including those of the Senior Leadership Team and Safeguarding Team. In most cases, these details will be the phone numbers that we already hold as your contact information.

Our telephone system also has a digital answering facility that records and stores messages. These messages are stored for 30 days and then will be automatically deleted.

Occasionally we may retain messages for a longer period using one of the lawful bases mentioned on page 3.

Computer Monitoring Solution

The Keeping Children Safe in Education (KCSiE) document and the relevant DfE Meeting Digital Standards in Schools and Colleges document, requires schools to have 'appropriate filtering and monitoring in place to safeguard pupils and staff. After conducting our annual online safety



audit, it was felt that physical monitoring (watching) was not sufficient to fulfil the 'monitoring' aspect of the new requirements.

To support with monitoring and the use of the Internet filtering alert emails, the school has implemented the cloud based monitoring solution on all ICT suite computers and all iPads.

What data is captured?

The system will monitor all computer use of staff and pupils on the devices that the software has been installed on. This includes all ICT suite computers and all Chromebooks, including devices that some pupils may take home.

When a user initiates an alert by using a keyword that has been flagged as inappropriate or tries to access a website that is not approved, a screenshot is taken. An email alert is then sent to the Senior Leadership. This email will also include the name and IP address of the user.

The screenshot will capture whatever is on the screen at that time. As a result, other personal data may also be collected.

Although all activity is monitored, only activities that relate to the banned world list or inappropriate use, will be captured.

Data Retention

Any data from a positive alert will be stored for 13 months and then deleted automatically. Any 'false positives' are stored for 30 days and then automatically deleted.

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, please put the request in writing and hand it to the School Office or email

info@windleshamschool.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 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 the Data Protection legislation. If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance.

Contact:

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

- The school office at: **info@windleshamschool.co.uk;**

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0309 123 1113 (local rate) or 01625 545 745 (national rate)