Privacy Notice for Pupils

For all schools in the Bosco Catholic Education Trust

This Policy has been approved and adopted by the
Bosco Catholic Education Trust.

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1. Bosco Catholic Education Trust Mission Statement

The Bosco Catholic Education Trust is a Christ-centred family of Catholic academies, within the Diocese of Arundel and Brighton, working together as one body to provide an outstanding education for all. As Catholic schools, we endeavour to develop confident, compassionate and faithful young people. Through partnership, collaboration and mutual support, we seek to enable all those entrusted to our care to become the person God called them to be.

"Serve the Lord joyfully"

2. Privacy Notice for pupils

Under the United Kingdom General Data Protection Regulation (UK GDPR), Bosco Catholic Education Trust is required to inform you of what data we collect, how, and why we need to collect it.

The UK GDPR sits alongside an amended version of the DPA 2018.

The DPA 2018 sets out the framework for data protection law in the UK. It updates and replaces the Data Protection Act 1998.

Everyone responsible for using personal data has to follow the 'data protection principles.'

They must make sure the information is:

- Used fairly, lawfully and transparently
- Used for specified, explicit purposes
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

3. Data Controller

Bosco Catholic Education Trust who complies with the GDPR and is registered as a 'Data Controller' with the Information Commissioner's Office (Reg. No. ZA245247).

The Data Protection Officer (DPO) for the school is Sheryl Cardwell, dpo@shardbusinessservices.co.uk

We ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

4. The Legal Basis for Processing Personal Data

The school may process personal data if at least one of the following applies:

- in order to protect the vital interests of an individual
- there is explicit consent.
- to comply with the school's legal obligations in the field of employment and social security and social protection law
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- for reasons of public interest in the area of public health

- for reasons of substantial public interest, based on law, which is proportionate in the circumstances, and which has provided measures to safeguard the fundamental rights and the interests of the data subject.

Where we collect special category data, we will identify a lawful basis under Article 6 of the UK GDPR and a separate condition for processing under Article 9.

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

- Personal identifiers and contacts (such as name, unique pupil number and address and contact details, carers details)
- Characteristics (such as ethnicity, language, nationality, country of birth, religion and free school meal eligibility)
- A safeguarding information (such as court orders and professional involvement)
- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Attendance information (such as sessions attended, number of absences and absence reasons, behavioural information, details of any exclusion information, alternative provision put in place)
- National Curriculum assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for an any relevant results, examination results)
- where pupils go after they leave us
- any special educational needs or disabilities as well as relevant medical information
- Safeguarding/Child Protection information.
- Biometric data in our high schools

Please note, this is list is not exhaustive.

6. Why we collect and use pupil information

We process personal data relating to those we employ to work at, or otherwise engage to work at our School for:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the qualities of our services
- To comply with the law regarding data sharing
- To safeguard pupils
- To assist with administration and communication systems e.g. cashless catering

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.

7. Who we share pupil information with

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- our local authority
- the Department for Education (DfE)

We also share information where necessary with:

- Ofsted
- Other school's within the Trust
- Welfare services, such as social services
- Law enforcement such as police

- Support services
- Educational support systems e.g. CPOMS
- Health services

Please note, this list is not exhaustive and information may be shared with other organisations where the law allows.

8. 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 will always seek consent for any other sharing of data.

We share pupils' data with the Department for Education (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 the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

9. 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.

10. 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.

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

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

To contact the department: https://www.gov.uk/contact-dfe

11. Retention Periods

Personal data will not be retained by the Schools for longer than necessary in relation to the purposes for which they were collected.

Information will be held in accordance with the Information and Records Management Society Tool Kit for Schools.

https://irms.site-ym.com/page/SchoolsToolkit

12. CCTV

The schools operate CCTV on the school sites as it is considered necessary to protect pupils' safety and/or the school's property

13. Biometrics

The Schools operate biometric recognition systems for the purchase of food from the school canteens.

All data collected will be processed in accordance with the GDPR data protection principles and the Protection of Freedoms Act 2012

Written consent will be obtained before biometric data is taken and used.

For more information about biometric data please refer to the ICO Guidance at the link below:

https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools

14. Rights

You have the right to:

1. be informed of data processing (which is covered by this Privacy Notice)
2. access information (also known as a Subject Access Request)
3. have inaccuracies corrected
4. have information erased
5. restrict processing
6. data portability (this is unlikely to be relevant to schools)
7. intervention in respect of automated decision making (automated decision making is rarely operated within schools)

8. Withdraw consent (see below)
9. Complain to the Information Commissioner's Office (See below)

To exercise any of these rights please contact the DPO.

15. Withdrawal of Consent

The lawful basis upon which the Schools process personal data is that it is necessary in order to comply with the Schools' legal obligations and to enable it to perform tasks carried out in the public interest.

Where the Schools process personal date solely on the basis that you have consented to the processing, you will have the right to withdraw that consent.

16. Complaints to ICO

If you are unhappy with the way your request has been handled, you may wish to ask for a review of our decision by contacting the DPO.

If you are not content with the outcome of the internal review, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted our internal review procedure. The Information Commissioner can be contacted at:

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