



## PRIVACY NOTICE FOR PARENTS/CARERS/PUPILS

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils. We, Glebe School, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Cantium Business Solutions (working with Invicta Law Ltd.)

**dpo@invicta.law**

### **The personal data we hold and process**

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

- Name
- Contact details, contact preferences, date of birth, identification documents, unique pupil number • Parental, sibling and extended family details
- Children who are adopted from care, looked after children, under special guardianship
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, language, eligibility for free school meals, Pupil Premium or special educational needs
- Behaviour information, including exclusion
- Details of any medical conditions, including physical and mental health, allergies, dietary requirements, medication and doctors' information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs and digital imagery of your child
- Carefully chosen and vetted educational apps
- CCTV images

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

### **Why we use this data**

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress and attainment
- Provide appropriate pastoral care
- Protect pupil welfare and keep them safe
- Assess the quality of our services
- Administer admissions waiting lists
- Meet statutory duties placed upon us by the Department for Education
- Carry out research
- Comply with the law regarding data sharing



In order to meet statutory requirements around appropriate education provision and to fulfil safeguarding requirements, we share information about school history and the latest known pupil and parent address and contact details in the event of a Child Missing Education, or becoming Electively Home Educated. This information also supports the in-year admissions process.

### **Our legal basis for using this data**

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it in accordance with the General Data Protection Regulation, Article 6 where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Sensitive data will only be processed in accordance with GDPR, Article 9 under the following conditions:

- With explicit consent of the data subject, unless reliance on consent is prohibited by UK law
- For protecting the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent
- For reasons of substantial public interest on the basis of UK law which is proportionate to the aim pursued and which contains appropriate safeguards

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using pupils' personal data overlap and there may be several grounds which justify our use of this data.

### **Collecting this information**

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

### **How we store this data**

Children's records are stored securely in paper files and on the school's secure server.

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. We will adhere to the Information Management Toolkit for Schools document for the storage and retention of data.

### **Data sharing**

We do 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 the General Data Protection Regulation, otherwise known as the GDPR) we may share personal information about pupils with:

- Our local authority (e.g. admissions)



- The Department for Education (e.g. attainment)
- The pupil's family and representatives (e.g. attendance)
- Educators and examining bodies (e.g. SATS test papers)
- Our regulators Ofsted, DFE and the ESFA (e.g. pupil data)
- Suppliers and service providers (e.g. caterers, sports coaches and music tutors)
- Central and local government (e.g. attainment)
- Health authorities (e.g. immunisations)
- Health and social welfare organisations (e.g. social services)
- Professional advisers, bodies and consultants (e.g. Educational psychologist and therapists)
- Youth support services
- Companies which provide essential IT and administration services (e.g. SIMS information system)
- Police forces, courts, tribunals (in relation to safeguarding)
- Collaborating schools for moderating purposes

### **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:

- 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 the local authority or provider of youth support services by informing the school. The right is transferred to the child once they reach the age of 16.

Data is held securely in accordance with the school's policies and is transferred to the youth support service via secure electronic transmission.

#### **Pupils aged 16+**

We 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
- Youth support services
- Careers advisers

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

Data is held securely in accordance with the school's policies and is transferred to the youth support service via secure electronic transmission.

### **Department for Education**

The Department for Education (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 purposes of those data collections, under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.



All data is transferred securely and held by the 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 they can conduct their statutory duties under the Schools Admissions Code including conducting Fair Access Panels.

### **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.

### **Parents and pupils' rights regarding personal data**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

As a parent of a pupil attending an academy there is no automatic parental right of access to educational records in our setting. However, we would consider any parental request for such access and decide whether it is appropriate to grant the request on a case by case basis.

If you require access to the above, please apply in writing, citing your reasons to the Headteacher.

### **Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing



- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Headteacher

### **Withdrawal of consent**

Where the legal basis for processing your personal data is consent, you have the right to withdraw that consent. You can do this by contacting the school office at [admin@glebe.bromley.sch.uk](mailto:admin@glebe.bromley.sch.uk).

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with the school in the first instance.

To make a complaint, please contact our Headteacher.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office,  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Headteacher in the first instance.

- Mr I Travis at [admin@glebe.bromley.sch.uk](mailto:admin@glebe.bromley.sch.uk)
- Cantium Business Solutions (working with Invicta Law Ltd.)  
Worrall House  
West Malling,  
Kent  
ME14 1XQ

DPO email: [dpo@invicta.law](mailto:dpo@invicta.law)  
DPO contact no: 01622 392051

### **Updates to this notice**

This notice is based on the Department for Education's latest model privacy notice for pupil information, amended to reflect the way we use data in this school. We may need to update this privacy notice periodically, so we recommend that you visit our website from time to time to view the latest version. This version was updated in June 2024.



## **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-databaseuser-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-informationcharter>

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