

# Sir Roger Manwood's School



## Privacy Notice for Parents

**Date of Approval:** September 2023

**Next Review:** September 2026

## Introduction

1. This privacy notice advises parents, carers and guardians of the school's data protection responsibilities on the collection, storage and use of personal information about students at Sir Roger Manwood's School (the School).

2. The School is committed to being transparent about how we collect and use personal data and to meeting our data protection obligations.

3. The School is required to explain how and why we collect personal data and what we do with that information. This privacy notice will also provide information as to what you can do about your personal information that is held and processed by us.

4. You are being provided with this notice because you can exercise your child's data protection rights on their behalf. Current guidelines state that when your child is older (usually when they reach the age of 13) they may be considered mature enough to exercise their own data protection rights.

5. We, Sir Roger Manwood's School, Manwood Road, Sandwich, CT13 9JX are the 'data controller' for the purposes of data protection law.

6. The Data Protection Officer is: Data

Protection Officer: Craig Stilwell

Address: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Telephone: 0345 548 7000 - option 1

7. This Privacy Notice should be read in conjunction with the following documents

- Data Protection Policy
- Records Management Policy
- Secure Data Handling Policy
- Privacy Notice for Students

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

- Name, address, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests/examinations
- Student and curricular records
- Characteristics, such as ethnic background, language, nationality, country of birth, religion
- Eligibility for free school meals
- Special educational needs information
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information, such as sessions attended, number of absences and absence reasons
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs and video recordings

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

## **Why we use this data**

10. We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services
- Administer the admissions test process and waiting lists for Y7-11
- Administer the admissions applications process for Y12
- Comply with the law regarding data sharing

## **Our legal basis (grounds) for using students' personal data**

11. We only collect and use students' personal data when the law allows us to. Most commonly we process it where:

- We need to comply with a legal obligation, i.e. the school is obliged to process the personal data to comply with the law. Statutory reporting requirements to the Department for Education (DfE) are included within this section. As is disclosing information to third parties such as the courts or the police where we are legally obliged to do so.
- We need it to carry out an official task in the public interest, for example, in order to provide students with an education, fulfilling our safeguarding obligations, managing the school efficiently

12. Less commonly, we may also process students' personal data in situations where:

- We have obtained consent to use it in a certain way. If we ask for your consent to use your child's personal data, you can withdraw this consent at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn. Any use of your child's information before you withdraw your consent remains valid. Examples include:
  - use of photographs or videos for the school website, social media sites, newsletters and publications as part of our advertising of the school
  - holding information relating to your child's religion
  - your child's photograph
  - personal information shared with other parents in the year group
  - registration on the biometric catering system
- We need to protect the individual's vital interests (or someone else's interests), for example, providing information to a medical professional about a student in emergency circumstances where they are unable to provide the information themselves.

13. Some of the reasons listed above for collecting and using students' personal data overlap and there may be several grounds which justify our use of this data.

## **Collecting information**

14. Whilst the majority of student information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

15. We obtain personal data in a variety of ways. Some of the information comes from the admissions forms and acceptance forms which you supply to us. This can contain information about you as well as your child and the same principles contained in this notice apply regarding your personal data. We also receive information about students from other schools and agencies, such as healthcare professionals. Data is also obtained from your child, their teachers and other students.

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

16. We keep personal information about students while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary to comply with our legal obligations. Our Records Management Policy sets out how long we keep information about students and is available on the school website.

### **Data sharing**

17. We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

18. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about students with:

- Our Local Authority (LA) – to meet our legal obligations to share certain information, such as safeguarding concerns, attendance, admissions, exclusions. The school's LA is Kent County Council
- The Department for Education (DfE) – to meet our legal obligations to share certain information, such as school census, attendance. This data sharing underpins school funding and educational attainment policy and monitoring.
- Appropriate members of staff – we need to tell them if your child has specific medical needs or they might need extra help with some tasks
- Schools that students attend after leaving us – we may need to pass on information which they need to look after your child, e.g. how well your child has behaved at other schools and their test results.
- External examination boards – entry information is shared in order for the awarding body to process GCSE, AS and A level results
- Ofsted – to enable them to meet their obligations when conducting an inspection
- Third party data processors – to enable them to provide analysis of internal and national examinations so that the school can monitor student progress and attainment (e.g. Fischer Family Trust, ALPS)
- Charities and voluntary organisations – to enable them to process donations and gift aid as appropriate
- Work experience supervisors – we may need to share contact information for students and parents as part of our and their safeguarding procedures
- Suppliers and service providers – to enable them to provide the service we have contracted them for, e.g. IT services provider, SchoolComms, photographer for student photos on the School Management Information System, trips providers (e.g. Duke of Edinburgh). Access to personal data will only be granted to a provider that has demonstrated compliance with the GDPR
- Insurance provider – we may need to share some information to ensure we maintain cover or to process any claims
- Health and social welfare organisations – we may need to share information about your child's health and wellbeing with those who have responsibility for student welfare
- Professional advisers and consultants – we might need to share students' information in order to assist us in the running of the school, if this is relevant to their work
- Police forces, courts, tribunals – sometimes we need to share information with the police or our legal advisers to help with an inquiry, e.g. safeguarding issues or injuries
- Governors regarding admission or exclusion appeals – to enable them to process the appeal
- UCAS – A level grade predictions are uploaded by school staff as part of the student's university application process

### **The National Student Database (NPD)**

19. The NPD is owned and managed by the DfE. It contains information about students 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 (LAs) and exam boards.

20. We are required by law to provide information about our students to the DfE as part of statutory data collections, such as the school census. Some of this information is then stored in the NPD. The law that allows this is regulation 5 of the Education (Information About Individual Pupils) (England) Regulations 2013.

21. To find out more about the data collection requirements placed on us by the DfE please visit [www.gov.uk/education/data-collection-and-censuses-for-schools](http://www.gov.uk/education/data-collection-and-censuses-for-schools)

22. To find out more about the NPD please visit [www.gov.uk/government/publications/national-student-database-user-guide-and-supporting-information](http://www.gov.uk/government/publications/national-student-database-user-guide-and-supporting-information).

### **Third parties**

23. The DfE may share information about our students 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

24. The DfE has robust processes in place to ensure the confidentiality of our data is maintained. There are stringent controls in place regarding access to and use of the data. Decisions on whether the 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 the requested data
- The arrangements in place to store and handle the data

25. To be granted access to student 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.

26. For more information about the DfE's data sharing process, please visit [www.gov.uk/data-protection-how-we-collect-and-share-research-data](http://www.gov.uk/data-protection-how-we-collect-and-share-research-data)

27. For information about which organisations the DfE has provided student information to (and for which project), please visit [www.gov.uk/government/publications/national-student-database-requests-received](http://www.gov.uk/government/publications/national-student-database-requests-received).

28. To contact the DfE with any questions about the NPD, please visit [www.gov.uk/contact-dfe](http://www.gov.uk/contact-dfe)

### **Students aged 13+**

29. Once our students reach the age of 13, we are legally required to pass on certain information about them to our LA and/or provider of youth support services, because they have legal responsibilities in relation to the education or training of 13–19 year olds under section 507B of the Education Act 1996.

30. This enables them to provide youth support services, post-16 education and training services, and careers advisers.

31. Parents/carers, or students once aged 16 or over, can contact our Data Protection Officer to request that we only pass the individual's name, address and date of birth to the LA.

### **Aged 14+ Qualifications**

32. For students enrolling for post 14 qualifications, the Learning Records Service will give us a student's unique learner number (ULN) and may also give us details about the student's learning or qualifications.

### **Transferring data internationally**

33. With cloud-based storage and some other services sometimes being supplied outside the UK, personal data can be sent to other jurisdictions.

34. 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.

35. Our servers and storage systems are based in the EU or the European Economic Area (EEA) and we have ensured that appropriate safeguards are in place to protect your personal data.

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

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

37. 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 13), or where the child has provided consent.

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

### **Other rights**

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

- Object to processing of personal data if it would cause, or is causing, damage or distress
- Prevent processing for the purpose of 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

40. To exercise any of these rights, please get in touch with our Data Protection Officer. See below for contact information.

41. If you have a concern about the way we are collecting or using your child's personal data, we ask that you raise your concern with us in the first instance by contacting our Data Protection Officer. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

**Contact us**

42. If you have any questions, concerns or would **like** more information about anything mentioned **in** this privacy notice, please contact our Data Protection Officer (see 5 above)