



# St Hugh's School

## **Privacy notice for parents/carers**

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' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils**.

We, St Hugh's School, are the 'data controller' for the purposes of data protection law.

Our data protection officer(s) are the School's Business Manager and Assistant Business Manager (see 'Contact us' below).

### **The personal data we hold**

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

- Contact details, contact preferences, date of birth, identification documents
- Attainment, Examination & Assessment information to support pupil learning
- Pupil and curricular records
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Special Educational Needs Information
- Exclusions / Behavioral information
- Relevant medical information (such as medication conditions, treatment required and Medical Care Plans)
- 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
- Photographic images in our schools, on school literature, websites or media
- CCTV images captured in school
- Post 16 learning information

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
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Comply with the law regarding data sharing



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## Privacy notice for parents/carers, cont'd

### 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 where:

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

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.

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

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. Our Records Management Policy sets out how long we keep information about pupils which can be viewed on the school's website: [www.st-hughs.n-lincs.sch.uk](http://www.st-hughs.n-lincs.sch.uk).

### Data sharing

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

- St Hugh's staff in the support of pupil learning
- The school's Local Governing Body
- Consultants engaged by the school to support pupil learning
- Cloud based educational programmes to support pupil learning and communication
- School Nursing Services
- External agencies; health, SEND, child protection, welfare and safeguarding services
- The school's local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions



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- Schools or colleges that the pupils attend after leaving us
- The Department for Education (DfE) – to meet legal statutory obligations to provide this data
- The pupil's family and representatives
- Educators and examining bodies
- Our regulator – Ofsted
- Health and social welfare organisations
- Police forces

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

We collect and use pupil information as processing is necessary for the purpose of the School Census under the Education Act 1996.

The lawful basis for collecting and using pupil information for general purposes is under Article 6 and Article 9 of the GDPR May 2018 Working Party, where data processed is special category.

### National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data ([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)).

You can also contact the Department for Education ([www.gov.uk/contact-dfe](http://www.gov.uk/contact-dfe)) with any further questions about the NPD.

### Youth support services

Once our pupils reach the age of 13, we are legally required to pass on certain information about them to North Lincolnshire Council as it has legal responsibilities regarding the education or training of 13-19 year-olds.

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

Parents/carers, or pupils 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 North Lincolnshire Council.



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## Privacy notice for parents/carers, cont'd

### 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 it is deemed appropriate by the school for parents/carers to make a request on behalf of their child as the school feels the child would not be able to comprehend the contents of their personal data, 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.

If you would like to make a request please contact our data protection officer.

Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact one of the school's Data Protection Officers.

### Other rights

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 data protection officer.



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## Privacy notice for parents/carers, cont'd

### Complaints

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance, following the school's Complaints Procedure or directly to the Information Commissioner's Office at: <https://ico.org.uk/concerns>.

### Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- School Business Manager – 01724 842960, [businessmanager.sthughs@northlincs.gov.uk](mailto:businessmanager.sthughs@northlincs.gov.uk), or
- Assistant Business Manager – 01724 842960, [assistantbm.sthughs@northlincs.gov.uk](mailto:assistantbm.sthughs@northlincs.gov.uk).

*This notice is based on the Department for Education's model privacy notice for pupils, amended for parents and to reflect the way we use data in this school.*