



Wilson's School Privacy Notice for Pupils and their Parents/Carers

(How we use pupil and parent/carer information)

Wilson's School is the Data Controller for the use of personal data in this privacy notice. If you would like to discuss anything in this privacy notice, please contact: Data Protection Officer, Wilson's School, Mollison Drive, Wallington, Surrey, SM6 9JW dpo@wilsonsschool.sutton.sch.uk

Wilson's School works to ensure that personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary. Authorised third parties such as ParentPay process and use data on behalf of Wilson's School and under its supervision/control and are therefore Data Processors.

The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, address and contact details of parent(s)/carer(s))
- characteristics (such as ethnicity, language, nationality, country of birth, religion and free school meal eligibility now and in the past)
- safeguarding information (such as court orders, professional involvement and information from social services)
- special educational needs (including the needs, plans and support)
- medical and administration (such as doctors' information, physical and mental health, disabilities, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- academic assessment, attainment progress and attitudes to learning (such as national curriculum assessment results (external) including GCSE and A Level, entrance examination information, internal examination and assessment results and reports to parents/carers)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- Destinations of where pupils intend moving on to once they've left Wilson's School
- Other including photographs, video recordings, CCTV images captured in the school and biometric data (fingerprint)
- Information required for administration of school visits, activities, work experience, catering systems (such as passport and visa information, payment information, meal choices).

This list is not exhaustive.

Why we collect and use pupil information

The personal data collected is essential for the school to fulfil its official functions and meet legal requirements. We collect and use pupil information, for the following purposes:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to get in touch with pupils and their parents when necessary
- d) to provide appropriate pastoral care, support and guidance
- e) to assess the quality of our services and carry out education related research
- f) to keep children safe, look after wellbeing and protect vulnerable individuals (food allergies, or emergency contact details)
- g) to promote the school and communicate with pupils and their parents about ways of

- supporting the school, including once the pupil has left the school
- h) to provide references for employment
- i) to protect pupils and others and for site security
- j) to meet the statutory duties placed upon us by the Department for Education (DfE)

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

- Public task: collecting the data is necessary to perform tasks that schools are required to perform as part of the statutory function
- Legal obligation: for example data collected for DfE census information
- Vital interests: to keep children safe, protect health interests

Consent: sometimes we may also use personal data where the pupil or the parent/carer has given permission to use it in a certain way. Where we require consent to use personal data it may be withdrawn at any time by the data subject.

In addition, concerning any special category data we will only process it where: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes; the processing is necessary for reasons of substantial public interest proportionate to the aim pursued; processing those data 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; processing is carried out in the course of our legitimate activities with appropriate safeguards; and/or processing is necessary for the purposes of carrying out our obligations and rights in the field of employment and social security and social protection law,

Some of the reasons listed for collecting and using pupil information overlap, and there may be several grounds which justify the use of personal data.

Collecting pupil information

We collect pupil information via the registration forms when the pupil starts at the school. We are also provided with some pupil information through a Common Transfer File or secure file transfer from the pupil's previous school. Further information is collected and created during a pupil's time at the school.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, 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 securely for the amount of time shown in our data retention procedures or for as long as the law requires us to (in relation to the basic pupil file this is until the pupil's 25th birthday). We keep some basic pupil information (name, date of birth, dates of attendance at the school) indefinitely for archiving purposes in the public interest and/or historical research purposes only. For more information on our data retention procedures please contact the Data Protection Officer.

Who we share pupil information with and why

We do not share information about our pupils with any third party without consent unless the law,

our function or our policies allow us to do so. We routinely share pupil information with:

- Local Authorities – to meet our legal obligations to share certain information, such as concerns about pupil’s safety, exclusions or destination data;
- the Department for Education (DfE) – to meet our legal obligations as part of data collections such as the School Census (see below for more detail);
- your parent(s)/carer(s) – to provide information about your progress and in case of emergency (we will take family circumstances into account, in particular where a Court Order is in place);
- Destination schools – on leaving Wilson’s in the public interest of delivering education;
- Youth Support Services – as it has legal responsibilities regarding the education or training of 13-19 year olds;
- Educators and examining bodies – necessary for the performance of our education function;
- Governors, Ofsted and Southwark Diocesan Board of Education – to enable them to evaluate the education we provide to our pupils which is in the public interest;
- Suppliers and service providers – to enable them to provide the services we have contracted them for e.g. ParentPay, Show My Homework, ESS SIMS, TestRegister, Applicaa, Wonde, School Cloud, google, school photographer, travel companies and other providers in relation to school visits, and other providers of education support systems;
- Public Health England – via local NHS Trusts for health data collections e.g. vaccinations and immunisations;
- Health and social welfare organisations/third parties – to enable us to comply with our duty of care and statutory safeguarding duties for pupil welfare including: therapists, clinical psychologists, the school counsellor, the school nurse, CAMHS, safeguarding software systems (CPOMS), social workers, Education Welfare Officer;
- Police forces and law enforcement agencies, Prevent teams, courts, tribunals – in order to uphold law and order;
- Wilson’s School Trust CIO.

This list is not exhaustive.

Further detail about pupil information use and sharing:

Youth support services

Once a pupil reaches the age of 13, we are legally required to certain information about them 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 youth support services, post-16 education and training services and careers advisers.

The information shared is limited to the pupil’s name, address and date of birth. However where a parent or guardian, or the pupils once aged 16, provides their consent, other information relevant to the provision of youth support services will be shared.

Data is securely transferred to the youth support service via secure methods and is stored on our systems and held until the pupil’s 25th birthday. For more information about services for young people, please visit our local authority website.

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 Department for Education (DfE) either directly or via our local authority for the

purpose 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 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.

Transferring data internationally

Where we share data with an organisation that is based outside the European Economic Area we will do so in accordance with data protection law. This is only likely to happen if a pupil's parent lives abroad or a pupil moves to a new school abroad. In these circumstances careful steps will be taken to make sure that it is safe to transfer pupil information for example by looking at whether the other country has good data protection laws. If necessary the school will consult with the pupil and their parents before sending the information.

Photographs and videos

Photographs and video are an integral part of school life and there are many occasions where the school will take photographs or video of pupils for its own use or allow an external company (i.e. a school photographer) to take images of pupils. In certain cases, where there is a lawful basis for processing, images can be taken and used without the consent of the pupil or their parent/carer. These include:

- Named photographs used internally to inform staff which pupils have medical or other conditions or needs
- Named photograph of a pupil to be used internally in SIMS for pupil identification purposes
- Video taken during lessons or pupil assessments for feedback or assessment purposes

Use of information about Parents, Carers and Guardians

The categories of information about parents, carers and guardians that we collect, hold and share include:

- Personal contact information (such as name, telephone numbers, addresses and email addresses)
- Records of meetings and other interactions with the school and information provided as part thereof (such as emails, meetings notes and letters)
- Records associated with eligibility for free school meals and pupil premium and 16-19 bursary
- Other including images, video and CCTV images

We use the information about parents, carers and guardians to:

- Communicate on matters directly related to the education, attendance, behaviour and conduct of their child
- Contact in the event of incident or emergency
- Protect pupil welfare and carry out safeguarding responsibilities
- Support the process of admissions of a pupil to the school

- Promote the school and communicate about ways of supporting the school

The lawful bases on which the school processes information about parents, carers and guardians are:

- Public task: collecting the data is necessary to perform tasks that schools are required to perform as part of the statutory function.
- Vital interests: to keep children safe, protect health interests.
- Legitimate interests: to contact parents/carers about ways to support the school because raising funds is clearly in the school's interests.
- Consent: sometimes we may also use personal data where the pupil or the parent/carer has given permission to use it in a certain way. Where we require consent to use personal data it may be withdrawn at any time by the data subject.

In addition, concerning any special category data we will only process it where: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes; the processing is necessary for reasons of substantial public interest proportionate to the aim pursued; processing those data 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; processing is carried out in the course of our legitimate activities with appropriate safeguards; and/or processing is necessary for the purposes of carrying out our obligations and rights in the field of employment and social security and social protection law,

We hold parent/carer/guardian data securely for the amount of time shown in our data retention procedures or for as long as the law requires us to.

We do not share parent, carer and guardian information with anyone without consent unless the law and our policies allow us to do so. We routinely share parent, carer and guardian information with the various bodies, organisations, companies and individuals listed above in relation to pupil information to the extent that the information is relevant and necessary. We may share parent, carer and guardian information with other third parties if we are legally obligated or if we have specific consent to do so.

Duty to inform of changes

It is important that the personal information we hold about our pupils is accurate and current. Please keep us informed if any information changes.

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. Pupils exercise their rights on their own behalf as long as they are competent to do so. To make a request for your personal information contact the Data Protection Officer.

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing

- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to what we are doing with your information
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

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

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Data Protection Officer, dpo@wilsonsschool.sutton.sch.uk

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on **14 February 2022**.

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-database-user-guide-and-supporting-information>.

Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools and 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.

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-information-charter>

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