

Heckmondwike Grammar School – Privacy Notice (How we use pupil information)

Who is responsible for this information?

Heckmondwike Grammar School Academy Trust is the Data Controller for the use of personal data in this privacy notice.

The categories of pupil information that we process include:

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Siblings information
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal / pupil premium entitlement)
- Safeguarding information (such as court orders and professional involvement)
- Special Educational Needs and Disability (including the needs and ranking)
- 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 and any previous schools attended)
- Assessment and attainment (such as Key Stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- Behaviour information (such as exclusions and any relevant alternative provision put in place)
- Trips and activities (dietary needs, medical needs and history, and for overseas trips; passport numbers / copies. birth certificates)
- Identity authentication (such as school photographs)
- Biometric information (cashless catering system)
- CCTV footage (safety and security)

Why we collect and use pupil information

The personal data collected is essential, for the school to fulfil their official functions and meet legal requirements.

We collect and use the pupil information, for the following purposes:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us by the Department for Education (or DfE)
- g) to facilitate school trips and activities
- h) to safeguard students
- i) to support students via careers guidance services
- j) to facilitate school photographs by a third party

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

- for the purposes of a), b), c), d), g) & i) in accordance with the legal basis of Public task: collecting the data necessary to perform tasks that schools are required to perform as part of their statutory function
- for the purposes of e) & h) in accordance with the legal basis of Vital interests: to keep children safe (food allergies, or emergency contact details)
- for the purpose of f) in accordance with the legal basis of Legal obligation: data collection for DfE census information
 - [Section 537A of the Education Act 1996](#)
 - [The Education Act 1996 s29\(3\)](#)
 - [The Education \(School Performance Information\) \(England\) Regulations 2007](#)
 - [Regulations 5 and 8 School Information \(England\) Regulations 2008](#)
 - [The Education \(Pupil Registration\) \(England\) \(Amendment\) Regulations 2013](#)
- For the purpose of j) in accordance with the legal basis of Legitimate interests: provision of basic details to a third party to facilitate school photographs and the potential commercial sale to parents / carers.

In addition, concerning any special category data:

- In the case of ethnicity and fingerprint: condition a: *the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject..*

Collecting pupil information

We obtain pupil information for new admissions via registration forms at the start of each academic year. In addition, when a child joins us from another school, we are sent a secure file containing relevant information.

Pupil data is essential for the schools' operational use. Whilst most of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR, we will inform at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

Storing pupil data

We hold pupil data securely for the set amount of time shown below.

- Admissions data is held for one year after the date of entry.
- Admissions Appeals records are held for 5 years after the process has closed.
- Pupil characteristics are retained on our secure MIS for anonymised trend analysis.
- Paper records (including medical records) are stored for the length of time the students is at school + 5 years.
- Biometric data is deleted 1 month after the student has left school.

- Attainment, Attendance, Behaviour and Exclusion data are retained for anonymised trend analysis.
- Safeguarding, SEND and Medical Incident records are retained until after the student is 25 years or older.

Who we share pupil information with

We routinely share pupil information with:

- Learning providers that the pupils attend after leaving us
- our local authorities
- youth support services (pupils aged 13+)
- the Department for Education (DfE)
- Local Authorities
- Exam Awarding Bodies
- NHS
- School photograph third parties

Why we routinely 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.

Youth support services

Pupils aged 13+

Once pupils reach the age of 13, we also pass pupil information to C&K Careers which acts on behalf of Kirklees Council to provide local authority Youth Support Services to young people aged 13 to 19. The LA has responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996. We must provide the names and addresses of our pupils and their parents and any further information relevant to the support service's role.

This enables them to provide services as follows:

- youth support services
- 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 their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

Pupils aged 16+

We will also share certain information about pupils aged 16+ with post-16 education and training providers in order to secure appropriate services for them, with our local authority and C&K Careers acting on behalf of Kirklees Council in providing Youth Support Services including careers guidance 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 providers
- youth support services
- careers advisors

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

Data is securely transferred to the youth service via a secure file transferring system and is stored within local authority software.

For more information about Kirklees Council's youth support services please go to C&K Careers service page at <http://ckcareersonline.org.uk/>

For information the National Careers Service page at <https://nationalcareersservice.direct.gov.uk/aboutus/Pages/default.aspx>

Department for Education

We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authorities for the purpose of data collections under:

- [Section 537A of the Education Act 1996](#)
- [The Education Act 1996 s29\(3\)](#)
- [The Education \(School Performance Information\) \(England\) Regulations 2007](#)
- [Regulations 5 and 8 School Information \(England\) Regulations 2008](#)
- [The Education \(Pupil Registration\) \(England\) \(Amendment\) 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

Local Authorities

We may be required to share information about our pupils with the local authorities to ensure that they can conduct their statutory duties under:

- The [Schools Admissions Code](#) including Fair Access Panels

Requesting access to your personal data

Under GDPR, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact

*Heckmondwike Grammar School
High Street
Heckmondwike WF16 0AH*

Tel 01924 402202

Email: office@heckgrammar.co.uk

Depending on the lawful basis above, you may also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- and
- a right to seek redress, either through the ICO, or through the courts

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, or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

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 or email office@heckgrammar.co.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 June 2021.

Contact

If you would like to discuss anything in this privacy notice, please contact:

Heckmondwike Grammar School

High Street

Heckmondwike WF16 0AH

Tel 01924 402202

Email: office@heckgrammar.co.uk

or

Kirklees Council, Information Governance Team

Email: information.governance@kirklees.gov.uk

Telephone: 01484 221000

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 (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

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/dfе-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>