



*Saint***GREGORY'S**  
*Bath*

## How We Use Your Information Privacy Notice for Student Data

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Title	Privacy Notice for Student Data	
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Version	Date	Amendments
V01.00	July 2018	Approved by Governors
V01.01	May 2019	Added further examples of sharing data
V01.02	January 2020	Added further examples of sharing data
V01.03	September 2020	Amended DPO email address and also an example of sharing data
V01.04	September 2021	Added further examples of sharing data
V01.05	September 2022	Added further examples of sharing data
V01.06	September 2023	Updated information about biometric data and work experience

*“In Christ we flourish”*

## **Introduction**

This notice is to help you understand how and why we collect personal information relating to our students and what we do with that information. It also explains the decisions that you can make about your/your child's own information.

St Gregory's, Bath, is a Data Controller for the purposes of Data Protection Legislation. The school has appointed Mrs Karen Tyler as its Data Protection Officer (DPO). If you are a student and have any questions about this notice please talk to your Tutor or your Head of Year. Alternatively, if you are a parent/carer you can contact the Data Protection Officer by emailing [dpo@st-gregorys.org.uk](mailto:dpo@st-gregorys.org.uk) or phoning 01225 832873.

## **What is "personal information"?**

Students' personal information is information from which a particular student can be identified. The school routinely collects, holds and uses personal data about its current and former students. This includes things like:

- Their name, date of birth, unique student number, address, etc;
- Characteristics such as their ethnicity, religion, languages spoken, nationality, country of birth, free school meal eligibility;
- Assessment and exam results and other academic data about their school work;
- Medical information, including details of any allergies or any medical conditions or special educational needs that they might have;
- Attendance information, such as sessions attended, number of absences, reasons given for absences and dates and times of signing in or out of the school site
- Information about family matters or personal circumstances that might affect their welfare or happiness;
- Behaviour records and data about any disciplinary matters or conduct issues that have arisen;
- CCTV, photos and video recordings in which their image or voice have been captured;
- Information about their future plans, including where they might move on to when they leave the school;
- Data obtained from scanning a thumb or fingerprint to be used when making purchases in the canteen.

We also hold information about our students' parents/carers and other contacts. Please see our Privacy Notice for Parents/Carers and Student Contacts for more information.

## **How does the school collect personal information about its students?**

The school routinely collects student data in a number of ways. Firstly, the admission form that prospective students and their parents/carers fill in gives us lots of personal information about new students before they start at the school. Teachers and other staff from the student's old school might also pass on relevant information to us. Parents and carers then continue to provide additional information (for example every time they contact the school to report an absence or when they discuss their child's progress with teachers). Likewise, the students themselves share personal information with their tutors and other staff throughout their time with us. Sometimes we also receive information about named students from other people/organisations, like the student's doctor if we need it to look after them, or from an agency that is supporting them (i.e. if they need emotional support). We also use CCTV to make sure the school site is safe and we often film or take photographs at events, so students' pictures and voices are often recorded in this way.

## **Why does the school collect personal information about students?**

We collect and use personal information about our students:

- to support their teaching and learning and to monitor and report on their progress;
- to provide a safe and secure teaching environment;
- to provide pastoral care, to support students and to safeguard and promote their welfare;
- to allow us to operate effectively as a school (for example when following our policies and procedures and to enable us to deal with necessary administration);
- to assess how well we are doing as a school and to let others know what we do;
- to comply with relevant legal obligations and for other related legitimate purposes.

## **What is our lawful basis for using this information?**

Under Data Protection legislation we collect and use most personal data about our students to carry out a task in the public interest, to support them in their learning and education.

We also have a legal obligation to keep certain information and to provide certain data to the LA (Local Authority) and/or to the DfE (Department for Education), such as:

- Assessment and exam results;
- Attendance information;
- Information about students who are in care;
- Information about students who receive Free School Meals.

We might also get consent from students and/or parents/carers to hold some additional data, such as:

- Information about students' ethnic origins and religious beliefs (we collect this data in order to monitor our progress regarding equality);
- Images of students recorded in photographs;
- Contact details once the student has left us;
- Biometric data

If you have given us consent to use certain information, you have the right to withdraw your consent at any time.

## **Where do we keep this personal student information?**

We keep all this information securely on our computer systems. It can only be accessed by members of staff who need to access it for legitimate reasons.

The Data Protection Officer is the person responsible at St Gregory's for managing how we look after personal information and deciding how it is shared.

We will keep all personal data about students safe and up to date. We will only use it for the reasons given above and we will destroy it when we no longer need it.

## **Who do we share the information with?**

We will only share your/your child's information with other people and organisations when we have to by law or when we have a good reason to do so. Here are some examples:

- From time to time we may be required to provide students' information to central government, i.e. through the Department for Education, the Education and Skills Funding

Agency (ESFA) or the Learning Records Service. We may need to share information with the local authority, i.e. to check eligibility for free school meals, for attendance reasons or for recording details of accidents occurring at school.

- In accordance with our legal obligations, we may share information with local authorities, the Department for Education, or other schools, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police or our legal advisers (i.e. this might be to help with an inquiry if a student is injured at school or if there is a burglary);
- We may share information about academic progress, SEND information and medical information with tutors that the school engages to support students with their studies;
- We may need to share information with medical professionals when a student requires medical care.
- We share student names, dates of birth and parents' / carers' contact details with the School Nursing Team and the School Age Immunisations team when required.
- We may share some information with our insurance company, for example, where there is an incident involving the school or to ensure that our cover is adequate.
- We may share information with our governors (for example if they are involved in any process, procedure or appeal which involves you/your child).
- If you/your child is going on a school trip or attending an event, we may need to share some of their information (i.e. information about relevant medical conditions) with the event organiser/host organisation or the tour operator or accommodation provider.
- We also have a risk management system (currently held by B&NES and called EVOLVE) and we have to enter student data onto that in order to assess risk when planning off site activities and school trips, etc. This means that you/your child's medical information and other personal data may need to be shared with this system for the purposes of risk assessments if they want to participate in such events.
- We may use photographs or videos of you/your child on the school's website or social media sites or in the prospectus or other publications to show prospective students what we do as well as for teaching purposes.
- We may include student names and photographs in programs for school productions;
- We need to let our catering team (Sodexo) know if you/your child has an allergy.
- We may share academic and behaviour and attendance records and data with parents/carers and other student contacts so that they can support your/your child's schooling.
- Once you/your child is aged 13 or over, we are required by law to pass on certain information to providers of youth support services in our area. We are required to provide their name and address, their parent/carer's name, address and telephone number, their unique student number and unique learner number and any further information that they ask for which is relevant to the support services' role (such as gender, ethnic origin and where the student might move on to when they leave the school). Until students are aged 16 their parent(s) can ask that no information beyond names, addresses and date of birth be provided. This right transfers to the student on their 16th birthday.
- We share students' school email addresses with careers advice websites such as Unifrog and Pathways CTM, so that students can use these to help with choices when they leave our school.
- We share student names, addresses, dates of birth and SEN/EAL and other information as appropriate with work experience placement providers.
- When you/your child takes public examinations (e.g. GCSEs) we will need to share information about them with examination boards.
- Depending on where you/your child will go after leaving us we may need to provide their information to other schools, universities or potential employers. For example, we may share information about exam results and provide references.
- We share student data with other schools or provisions when students have a placement with that provision.

- We share student names, dates of birth, contact details for parents/carers, SEN information, medical information, assessment data and attendance data with partner schools when students attend them for some of their subjects.
- We may also engage contractors to provide services for the school from time to time, i.e. to facilitate the effective administration of our systems and this may require them to have access to personal data. If so, we will ensure that they are contractually bound to respect confidentiality and comply with all relevant data protection requirements.
- We share student names, classes, and students' school email addresses with on-line learning resources, such as Doodle, Kerboodle, MyMaths, Linguascope and Educake etc
- We may share medical and SEND information with peripatetic Music and Performing Arts teachers to ensure the safety and well-being of students during these lessons.
- We routinely publish lists of names of students who have completed their studies in Y11 and Y13 at St Gregory's, eg on leavers' hoodies or in programs for awards ceremonies and Prize-giving. If you have any concerns or do not wish for your/your child's name to be published, please contact the Data Protection Officer.

For more information about how and why student data is processed by the LRS, please go to:  
[www.gov.uk/government/publications/lrs-privacy-notice](http://www.gov.uk/government/publications/lrs-privacy-notice)

For more information about the data we share with the DfE, please go to:  
[www.gov.uk/education/data-collection-and-censuses-for-schools](http://www.gov.uk/education/data-collection-and-censuses-for-schools)

To find out more about the National Pupil Database, please go to:  
[www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information](http://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information)

This list is not exhaustive.

### **How long do we keep this information for?**

St Gregory's has a Records Management and Retention Policy which sets out how long we will keep your/your child's personal information for. The school may keep information for longer than the specified retention period in certain circumstances. The exact period will depend on the type of data involved.

### **What decisions can you make about your/your child's information?**

- If information is incorrect you can ask us to correct it.
- If you would like us to change or update the information we hold about you/your child please speak to your Tutor if you are a student or to the Data Protection Officer if you are a parent/carer.
- If you would prefer that we keep certain information confidential then please speak to your Tutor or the Data Protection Officer.
- If you have given us consent to store any of your information, you have the right to withdraw your consent at any time.
- You have the right to request access to the information we hold about you/your child. To make a request for your personal information, please contact the Data Protection Officer, Mrs Karen Tyler by emailing [dpo@st-gregorys.org.uk](mailto:dpo@st-gregorys.org.uk) or phoning 01225 832873.

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