Privacy Notice (How we use student information)

The categories of student information that we process include:

- personal identifiers and contacts (such as name, unique student number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, 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)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- biometric information (for our cashless catering system)
- CCTV footage (which is retained for a maximum of 6 months)
- SignIn app
- AccessIT (Library Software)

This list is not exhaustive, to access the current list of categories of information we process please contact the school.

Why we collect and use student information

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

a) to support student learning
b) to monitor and report on student 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 for DfE data collections
g) to support the smooth running of the school

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

a. where it is necessary for compliance with a legal obligation (Article 6 (c) of the GDPR);
b. where it is necessary for the performance of a task carried as part of our public task (Article 6 (e) of the GDPR).
c. where we have the **consent** of the data subject (or their parent if under 18) (Article 6 (a) of the GDPR) - for example to share the names and photographs of students with the public.

In addition, concerning any special category data:

d. Under Article 9 a of the GDPR where we have the **explicit consent** of the data subject (or their parent if under 18) for example to use biometric data in our cashless catering system.

e. under Article 9 - the religion of the student (if supplied by the parent or carer).

g. under Article 9 - h information about the health of the student (if supplied by the parent or carer).

**Collecting student information**

We collect student information via registration forms at the start of the school year which may be updated from time to time, the Common Transfer File (CTF) from other schools and secure hard copy file transfer from previous school.

Student data is essential for the schools’ operational use. Whilst the majority of student 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 student information to us or if you have a choice in this.

**Storing student data**

We hold student data securely for the set amount of time shown in our data retention schedule. Student data is held until the 25 years after the date of birth of the student. We follow the best practice guidance from the IRMS Information Management Toolkit for Schools. [https://irms.org.uk/](https://irms.org.uk/)

**Who we share student information with**

We routinely share student information with:

- schools that the students attend after leaving us
- our local authority
- youth support services (students aged 13+)
- the Department for Education (DfE)
- the NHS School Nurses
- Suppliers who provide or support online educational services to our students and/or staff

**Why we regularly share student information**

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

We share students data with the Department for Education (DfE) on a statutory basis. The data sharing underpins school funding and educational attainment policy and monitoring.
We are required to share information about our students with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information about individual students (England) Regulations 2013.

**Youth support services**

**Students aged 13+**

Once our students reach the age of 13, we also pass student information 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 services as follows:

- youth support services
- careers advisers

The information shared is limited to the child’s name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child/student once they reach the age 16.

**Students aged 16+**

We will also share certain information about students aged 16+ with 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 services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

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 students with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under section 3 of The Education (Information About Individual Students) (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.

**Requesting access to your personal data**

Under data protection legislation, parents and students 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 our 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 direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- 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 or directly to the Information Commissioner’s Office at [https://ico.org.uk/concerns/](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 our Data Protection Officer dpo@thedownsschool.org.

**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 in December 2021.

**Contact**

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

Data Protection Officer dpo@thedownsschool.org.
The Downs School
Compton
Berkshire
RG20 6AD
The Government has asked us to include the following information

How Government uses your data

The student 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 Student 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 Student Database (NPD)

Much of the data about students in England goes on to be held in the National Student Database (NPD).

The NPD is owned and managed by the Department for Education and 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 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-student-database-user-guide-and-supporting-information

Sharing by the Department

The law allows the Department to share students’ 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. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 students per year to the Home Office and roughly 1 per year to the Police.
For information about which organisations the Department has provided student 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:  

**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