

Layered Privacy Notice

Ellesmere Port Catholic High School



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| Approved by: | Mrs C Vile, Headteacher |
| Lead of Review: | Miss S Oscroft, Strategic Data Manager |
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General Information

Whether you are a parent, student, member of staff, a visitor to our school or simply to our website, we collect and use personal information about you for a variety of reasons.

We are a 'data controller' of this personal data which means we decide how and why your data is processed and as a data controller, we are registered with the Information Commissioner's Office under number Z2092374

We have a responsibility to tell you how and when we use your personal data. We do this through our privacy notice which we will keep up to date with details of:

- Why we are using your personal data
- What allows you to use my data
- What type of data we use and how long we will use it for
- Where we get the information from and who we share it with
- Your rights in relation to the data we hold, including when to complain to the Information Commissioner's Office
- And the details of our Data Protection Officer

This notice should give you all the information you need to understand how we handle your personal data.

In this notice, you will see different names or terms used that you may not be familiar with, such as:

- **Data controller:** This is the school as we are in charge of the information we collect.
- **Data processor:** This is an organisation or an individual that processes information on our behalf.
- **Data Protection Lead (DPL):** This is the appointed first point of contact at the school.
- **Data Protection Officer (DPO):** This is the person who makes sure we do everything the law says.
- **Personal data:** This means any information that can be used to identify someone, such as your address and date of birth.
- **Legal Basis** – This is what allows us to use your information and we must identify where and why we are legally allowed to do something
- **Legitimate Interest** – This means that we process your information in the interest of the school or in your own personal interests
- **Public Task** – This relates to information we must collect and use in our role as a school, so this could be information relating to each student.
- **Consent** – We may need your permission to collect and use your data and, if we do, we rely on your consent.

To help you identify what information we collect, we have broken down this Privacy Notice into key areas to cover what we collect and use for:

- [Students and Parents](#)
- [Staff and Governors](#)
- [School Visitors](#)
- [Website Visitors](#)
- [CCTV](#)
- [Biometric Data](#)

We also provide information on your [data protection rights](#) and how to [Access to your information](#)

Contact Details

General Contact Details

Steph Oscroft is the school's Data Protection Lead and you can contact her if you have any concerns or questions in relation to data protection and the use of your personal data.

Miss S Oscroft, Data Protection Lead
Ellesmere Port Catholic High School
Capenhurst Lane
Ellesmere Port, CH65 7AQ
steph.oscroft@epchs.co.uk
Tel. 0151 355 2373

You can also contact the School Data Protection Officer –

Data Protection Officer: Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Telephone: 0203 326 9174
Lead Contact: Craig Stilwell

Data Protection Officer Contact Details

In order to ensure we comply with our responsibilities under data protection legislation, we have appointed a Data Protection Officer.

Data Protection Officer: Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Telephone: 0203 326 9174
Lead Contact: Craig Stilwell

You can contact the DPO if you have any concerns or questions about how or why we collect and use personal data, as well as to report any possible breaches of data protection.

Your rights

If you wish to exercise any of your [rights under data protection](#) you should contact either the DP Lead or the DPO who will be able to guide you through the appropriate steps.

Should you make a request to any other member of staff, they will pass your enquiry on to the DP Lead or DPO who will contact you to help.

Your right to complain

If you are unhappy with how we deal with any of your requests, you can complain to our Data Protection Officer in the first instance, who will review all the steps taken and the decision made.

If you are still unhappy, you can contact the Information Commissioner's Office for advice. As a starting point, they will always ask if you have raised any concerns with us first, so it is important that you let us know of any issues you have and allow us to work with you to resolve them. But, if you do remain unhappy after we have dealt with your concerns, you can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Your data protection rights

Whether you are a student, a parent, member of staff or a visitor, you have a number of rights relating to how we collect and use your information.

These rights depend on why and how we use your information so they only apply in certain circumstances, but we will make it clear what rights apply and when.

If you decide to exercise any of your rights you can make a request either verbally or in writing (email is fine) and you can do so free of charge (there are only very rare occasions where we may have to charge, but we will tell you about this in advance).

We have 1 month to respond to your request. If we need to extend this time limit, we will explain why and tell you within that initial period.

A request can be made direct to our Data Protection Lead or our Data Protection Officer. It can be made in verbally, in writing (an email is fine) admin@epchs.co.uk

You can find full details about your rights on the [ICO website](#) but in summary, they are:

Right of Access

You have a right to ask for a copy of any personal information that we hold about you, or your child. This is your most important right and always applies, although there may be reasons why we cannot provide all of the information you request. For further information about making a request, visit the [‘Access to your information’](#) section.

Right of Rectification

You can ask us to correct any information we hold that you think may be inaccurate, as well as to complete any information you think is incomplete.

To help us deal with any request you should:

- Clearly state what you believe is inaccurate or incomplete
- Explain how you think the information should be corrected
- Provide evidence of any inaccuracies where possible

We will let you know if we have corrected, updated or removed the information as requested, as well as telling you when we think the information is accurate and should not be changed.

Right to Erasure

This is sometimes called the ‘right to be forgotten’ meaning that, in some cases, you can ask us to delete information we hold about you.

The Right to Erasure is not absolute, this means it is not automatic, and in the majority of cases we may be unable to delete the information we hold. Where we cannot comply with your request, we will explain why.

The Right to Erasure only applies when:

- We no longer need your data.
- You consented to our using your data but have withdrawn that consent.
- You object to how we use your information, and your rights outweigh our use.
- We should not have been using your information.
- We are legally required to delete your information

In the majority of cases, the information we use as a school is required by law so there are only a few cases where this option will apply.

Right to Restriction of Processing

You may have the right to limit how we use your data and this could include stopping us from deleting it. You can generally do this if you are questioning the accuracy of the information we have or the way in which we are using it.

Where we don't agree with your objections, we will clearly tell you why we can't or won't restrict how we use it.

Right to Object to Processing

You also have the Right to Object to how we process your information. This is similar to the Right of Restriction but means we have to stop using your information.

If we are unable to comply with your request, it is our responsibility to prove why we should be able to continue to process your information.

If you are objecting to your information being used for marketing purposes, we would have to stop using your information immediately.

Right to Data Portability

You have a right to ask for us to transfer information you gave to us electronically and which is automatically processed, to another organisation. In reality, this right will rarely apply to information we deal with as a school.

Rights related to automated decision making

Where information is used for the purposes of profiling or a decision is made solely by automated means with no human involvement, you have the right to object and ask for human intervention in any decision. The school does not have any automated decision making function.

Quick guide to your rights

| Legal Basis | Rights | | | | | |
|---------------------|--------|---------------|---------|---------------------|------------------|--------|
| | Access | Rectification | Erasure | Restrict Processing | Data Portability | Object |
| Consent | Yes | Yes | Yes | Yes | Yes | No |
| Contract | Yes | Yes | Yes | Yes | Yes | No |
| Legal Obligation | Yes | Yes | No | Yes | No | No |
| Vital Interests | Yes | Yes | Yes | Yes | No | No |
| Public task | Yes | Yes | No | Yes | No | Yes |
| Legitimate Interest | Yes | Yes | Yes | Yes | No | Yes |

Timescales

We have 1 calendar month to respond to any rights request you may make and we will keep you informed of our progress and any delays we may experience. This means that if you make a request on the 15th March, we will respond by the 16th April at the latest. Where that date is a weekend or a public holiday, we will respond by the next available date.

In certain circumstances, such as when a request is particularly complex, we can extend the deadline to respond by a further two months. We will always tell you of our decision to do this.

While we will always work to comply with providing your information before the 1 month deadline, there may be occasions where we are unable to, for example if the request is particularly complex. Under those circumstances, we may have to extend the time limit for successfully responding to your request.

If we do this, we will always tell you in advance of the deadline. Any steps we put in place to handle requests made when the school is closed for extended periods will be documented in our [Right of Access Policy](#)

Access to your information

The Right of Access is one of your most important rights and is also known as a [Subject Access Request](#).

You can make a Subject Access Request to find out what data we hold and to ask for a copy of that data. A request can be made verbally or in writing but in order to help you make your request easier we provide a form you may find useful to use attached to the policy.

Identification

Once you have made a request we may need to ask you for some proof of identification - this may not always be necessary, but in some cases we may need to verify you are who you say you are – for example if we receive a request from an unknown email address.

We will also need to make sure who you are making the request for – are you asking for data we hold on you or are you asking for information we hold on a child in your care or on behalf of someone else? Again, if you are acting on behalf of someone else, we need to establish that you have permission to do so.

Timescales

Once we have confirmed the details of the request we have one month to provide you with a copy of the information you requested. When requests are particularly complex we may extend this by a further two months but we will tell you this beforehand. This may be the case if a request is made over a significant holiday period where we may be unable to adequately identify information.

There may be some information we hold that we are unable to share with you if it relates to other individuals and in those circumstances we will remove that information.

You can also ask us to tell you:

- Why we are processing your personal data
- To whom your personal data is disclosed
- The source of your personal data

While we will always work to comply with providing your information before the 1 month deadline, there may be occasions where we are unable to comply that quickly, especially if your request is particularly complex. Under those circumstances, we may have to extend the time limit for successfully responding to your request. If we plan to do this, we will always tell you.

You can find details of our Subject Access Request policy [here](#)

Requesting children's data

It must be remembered that parents accessing their child's personal data under the UK *GDPR* are exercising the right of subject access on the child's behalf where they have parental responsibility for the child. They do not have an automatic right to information held about their child.

In England the age at which a child reaches sufficient maturity to exercise their own right to access their information is normally considered to be 13, but this may vary amongst individuals.

Once a child reaches sufficient maturity, the parent may only act with their child's consent. As a result, where a child is over 13 and a request is made on their behalf, the school may seek their consent for someone to access their records on their behalf.

When deciding whether information about a child can be released, consideration will be given to the best interests of the child.

The school will not service a Subject Access Request for information held on a child if the child, having been deemed capable of understanding the nature of the request and the consequences of their actions, refuses to consent to this information being disclosed.

If you are unhappy with how we deal with your requests, you can complain to our Data Protection Officer who will review all aspects of how we have dealt with it. If you are still unhappy, you can complain to the [Information Commissioner's Office](#)

Students and Parents Information

Why Do You Need My Information?

The School collects and processes personal data (including special category data) about students and parents for a range of purposes linked to our responsibility to educate and develop young people. These are: -

- For the purposes of student admission (and to confirm the identity of prospective students and their parents);
- To provide education services and extra-curricular activities to students, and monitoring students' progress and educational needs;
- To derive statistics which inform decisions related to the funding of schools and the management of our budget;
- To assess performance and to set targets for schools;
- To safeguard students' welfare and provide appropriate pastoral (and where necessary medical) care;
- To give and receive information and references about past, current and prospective students, and to provide references to potential employers of past students;
- In order to manage internal policy and procedure;
- To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the school;
- For the purposes of management planning and forecasting, research and statistical analysis, including those imposed or provided for by law (such as diversity analysis);
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate (for example Ofsted);
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT security policy;
- To make use of photographic images of students in school publications, on the school website and (where appropriate) on the school's social media channels;
- To allow students to take part in appropriate school trips, visits and other school organised events;
- To provide appropriate pastoral care;
- To comply with our responsibilities for the prevention and detection of crime
- For security purposes, including CCTV in accordance with the school's CCTV policy; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

Whilst the majority of information we collect and use is mandatory, some of it is provided to us by parents or students on a voluntary basis.

We will always inform you whether you are required to provide certain information to us or if you have a choice in this.

What information do we use?

The School collects and uses the following categories of personal data about students:

| What do we collect? | What is it? | How do we collect it? |
|----------------------|---|---|
| Personal Information | <p>This is information such as:</p> <ul style="list-style-type: none"> • Name, student number, date of birth, gender and contact information; • Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses; | <p>Most of this information will have been provided when students join the school and kept up-to-date by the contact detail forms sent home to parents each year.</p> |
| Characteristics | <p>This includes information such as</p> <ul style="list-style-type: none"> • gender • age • nationality • ethnic group • religion • free school meal eligibility | <p>The majority of this information will have been provided when students join the school.</p> |
| Educational details | <p>We collect and use information relating to studies and behaviour. Some of this information we collect so that we can understand how students are performing and some of it we are required to report to the Local Authority or the government so they know such things as how many students we have. This information includes:</p> <ul style="list-style-type: none"> • Attendance details (such as sessions attended, number of | <p>This information is collected as student's progress through their time with the school and is based on their attendance, performance and development.</p> <p>Information is collected from a variety of day to day sources such as class registers, test results, reports and assessments.</p> |

| | | |
|----------------------|---|--|
| | <p>absences and reasons for absence);</p> <ul style="list-style-type: none"> • Performance and assessment information; • Behavioural information (including exclusions); • Special educational needs information. | |
| Medical information | <p>As well as details of any sickness absence a student may have had, parents and students may have also provided us with details of any illness or condition they may have or medication they are required to take.</p> <p>In the majority of cases, they have provided this information voluntarily so that we are aware of how we can offer any assistance</p> | Information may be provided by parents or guardians at any point during a child's time with the school. |
| Photographs and CCTV | <p>As the school operates CCTV cameras, students will regularly be captured by them during the day and as they move around the school. Details of how we handle CCTV footage can be seen in this Section</p> <p>We also capture images of students engaging in school activities, but we will ask for parental consent to ensure parents are happy for photos of students to be used and under what conditions.</p> | <p>CCTV is captured on school property on daily basis.</p> <p>Where photographs of students are taken, parents are informed and consent is sought for their use.</p> |
| Computer use | In order to safeguard the school's IT system from attack or misuse, we automatically monitor such things as websites visited, this means that if there is a problem, we can trace the accessing of inappropriate or infected material back to an individual. | Monitoring of access to websites etc. is automatic. |

Purpose and legal basis for collecting and using this information

We collect and use this information for a variety of purposes and under a number of different legal bases. The legal basis is what allows us to process personal data.

The legal bases we used can be summarised as:

| Legal Basis | When | What allows us |
|---------------------|--|--|
| Public Task | When we collect and use personal data in order to fulfil part of our function as a school, for example when we are required to use information under the Education Act 2002 as part of our official authority as a school. | Official Authority or Public Task is covered by article 6(1)(e) of the GDPR. |
| Legal Obligation | For example, where we need to comply with health and safety laws. | Legal obligation is covered by article 6(1)(c) of the GDPR. |
| Contract | To enter into a contract with you and to meet our obligations under that contract. For example, we need to process your data in order to provide a specific service which we do under contract, this could be the hiring of musical instruments for an arranged period. | Contract is covered by article 6(1)(b) of the GDPR. |
| Legitimate Interest | In other cases, the school has a legitimate interest in processing personal data during an individual's relationship with the school, this could be the monitoring of access to the School's computer network. | Legitimate interest is covered by article 6(1)(f) of the GDPR. |
| Consent | There will be some cases where you give us permission to use your information and this will only be used under consent . Where we use consent we will ensure it is appropriate and that you have the right to refuse or withdraw | Consent is covered by article 6(1)(1) of the GDPR. |

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| | consent at any time and that any decision you make to consent is a free one. | |
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Our legal obligation or public task under various laws, relating to the provision of education, includes, but is not limited to:

- The Education Act 1944, 1996, 2002
 - The Education & Adoption Act 2016
 - The Education (Information About Individual Students) (England) Regulations 2013
 - Education and Skills Act 2008
 - Education (Student Registration) (England) Regulations 2006
 - Statutory Guidance for Local Authorities in England to Identify Children Not Receiving Education – February 2007)
 - Education and Inspections Act 2006
 - The Children Act 1989, 2004
 - The Childcare Act 2006
 - The Children & Families Act 2014
 - Local Safeguarding Children Boards Regulations 2006 (SI 2006/90)
 - The Localism Act 2011
 - Contract (traded services)
- We also process data on criminal convictions and offences including information relating to criminal allegations and proceedings. Criminal Data is processed under Article 10 of the GDPR and, Schedule 1 Pt3 - 29, 33, 36 of the Data Protection Act 2018.
 - Where the information we process is considered to be ‘special category data’ such as health data, we do so under one of the conditions of Article 9 of the GDPR. These are:

Article 9 (2)(a) -Where you have given explicit consent for this information to be used.

Article 9 (2)(b) - Where the information is required for us to fulfil our employment obligations

Article 9 (2)(d) - Where it is a legitimate activity, such as monitoring access to our ICT network

Article 9 (2)(f) - Where it would be required to establish, exercise or pursue a legal claim

Article 9 (2)(g) - Where we have identified a substantial public interest, such as the safeguarding of children

Article 9 (2)(h) – Where it is required for reasons of occupational health purposes

Who will you share my information with?

There are a number of key organisations we are required to share data with:

- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Students) (England) Regulations 2013;
- Ofsted;
- Youth support services – under section 507B of the Education Act 1996, to enable them to provide information regarding training and careers as part of the education or training of 13-19 year olds;
- Other Schools that students have attended/will attend;
- NHS for delivery of child health services, such as inoculation programmes and school nurses. They also use information about students for data research and statistical purposes;

- NHS Digital for analysing and presenting a range of health & social care data, including height and weight of students;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- LADO;
- Training providers;
- Professional advisors such as lawyers and consultants;
- Support services (including HR support, insurance, IT support, information security, pensions and payroll);
- The local authority;
- [Named third party service](#)

The School always ensures that reasons for sharing data with any of these organisations are in accordance with the GDPR and put in place appropriate safeguards for any personal data transfers.

Why we share student information with the DfE

We share children and young person's data with the Department for Education (DfE) on a statutory basis under section 3 of The Education (Information About Individual Students) (England) Regulations 2013.

This data sharing underpins school funding, educational attainment policy and monitoring and enables them to;

- produce statistics,
- assess our performance,
- determine the destinations of young people after they have left school or college
- and to evaluate Government funded programmes.

There are also a number of data collection requirements involving the DfE that we cover in Section 6.

Why we share student information with the Local Authority

We are required to share various data with Cheshire West and Chester Council, including:

School Roll and Attendance - We share information relating to school rolls and attendance to comply with:

- Section 436A of the Education & Inspections Act 2006 which places a duty on all schools and local authorities to make arrangements to identify children not receiving education.
- The Education (Student Registration) (England) Regulations 2006 which govern the circumstances in which a student may be placed on or removed from a school register.
- The 2016 amendment to the Education(student Registration) (England) Regulations 2006 which requires all schools within an LA to share changes to the school roll with the relevant LA. This enables the school and the local authority to ensure that all children are in receipt of suitable education. The LA exerts its right under this legislation to request the details of students who start the school in the first year of admission for the school.
- From 2007 there has been a statutory duty on all Local Authorities in England and Wales to have systems and procedures in place to monitor Children Missing Education (*current*

guidance Children missing education - Statutory guidance for local authorities September 2016). Since 2007 the local authority has maintained records of the education provision of all children in the city known to Education services. Work has been undertaken by schools and the Education Welfare Service with the aim of ensuring that all children who leave our schools safely enter the education system in their new location.

- The duty to share information with the LA on children with irregular attendance is stated in section 12 of the Education (Student Registration) (England) Regulations 2006.
- With regards to children not attending full-time, Ofsted takes the view that there is an obligation for all schools to notify the local authority of any such arrangements for their students. This obligation was detailed for the first time in the Ofsted report Students Missing Out on Education in November 2013. This includes all schools including both maintained and independent Schools.

Key Stage Data Collections

The Assessment and Reporting Arrangements (ARA) Early Years Foundation Stage – this states that all providers, schools and academies have a statutory duty to submit EYFS Profile data to their geographic local authority. The LA then has a corresponding duty to submit that information to the DfE. The ARA is issued by the Department for Education based for the following legal status:

- Section 39(1)(a) of The Childcare Act 2006 stipulates that Early Years providers must secure that their provision meets the learning and development requirements as specified in the EYFS (Learning and Development Requirements) Order 2007 (S.I. 2007/1772) (amended in 2012). The Act states that this Order can specify the arrangements which are required for assessing children for the purpose of ascertaining what they have achieved in relation to the ELGs.
- All English local authorities must have regard to any guidance given by the STA in exercising their function under the EYFS (Learning and Development Requirements) Order 2007, article 4.2. The learning and development requirements are given legal force by an Order made under section 39 (1)(a) of the Childcare Act 2006.
- Academies are required to implement the requirements of the EYFS as set out in section 40 of the Childcare Act 2006 and must comply with local authority moderation requirements. All registered Early Years providers are required to complete the EYFS assessment for any children in the final year of the EYFS and to participate in moderation. This includes an academy providing for children in the final year of the EYFS.
- The Standards and Testing Agency (STA) sets out the options for academies regarding Key Stage 1 data (including Year 1 Phonics check) in the Key Stage 1 Assessment and Reporting Arrangements. This document contains provisions made pursuant to article 9 of The Education (National Curriculum) (Key Stage 1 Assessment Arrangements) (England) Order 2004, as amended. This order is made under section 87(3) of the Education Act 2002. This document gives full effect to, or otherwise supplements, the provisions made in the order and as such has effect as if made by the order.
- The Standards and Testing Agency (STA) sets out the options for academies regarding Key Stage 2 data in the Key Stage 2 Assessment and Reporting Arrangements. This document contains

provisions made pursuant to article 11 of The Education (National Curriculum) (Key Stage 2 Assessment Arrangements) (England) Order 2003, SI 2003/1039 (as amended by SI 2009/1585, SI 2010/290, SI 2010/677, SI 2011/2392, SI 2012/765 and SI 2012/838). This order is made under section 87(3) of the Education Act 2002. This document gives full effect to, or otherwise supplements, the provisions made in the order and as such has effect as if made by the order. This assessment and reporting arrangement (ARA) also contains guidance and information that does not form part of the law.

- The ARAs are reviewed annually and this agreement covers the current Arrangements at the time of the data collection request.

Other statutory data for providing services

- The DfE provides an online Free School Meal Eligibility Checking Service (FSM ECS) which allows local authorities to check whether students in their area are entitled to free school meals when they make an application. The system checks information held by the relevant government departments and gives a speedy response, meaning a claim made on the FSM ECS one morning can result in a student getting their first free meal the next day.
- This data would facilitate the local authority to promote or improve the economic, social and environmental wellbeing of children and families. This will include the provision of improvements to educational opportunity as well as the reduction or elimination of risk factors for children within Leicester, (Section 2, Local Government Act 2000). This data would support the local authority to perform its functions of providing services to children and families under Part III, Section 27, of the Children Act 1989.
- This information would also contribute to ensure the provision of appropriate services for all children and young people 'in need' or at risk or likely to be at risk of suffering significant harm (Sections 17(1) and 47 (1) of the Children Act 1989) or otherwise considered to be at risk of social or educational exclusion.
- The local NHS Trust use information about students for a range of school delivered child health services such as inoculation programmes. They also use information about students for data research and statistical purposes, to monitor the performance of local health services and to evaluate and develop those services. Statistics are used in such a way that individual students cannot be identified. Information on the height and weight of individual students may however be provided to children and their parents and this will require the NHS Trust to maintain details of students' names for this purpose for a period designated by the Department of Health following the weighing and measuring process. The NHS Trust may also provide individual schools and LAs with summary information on students' height and weight but will do in a way that means that individual students cannot be identified.

How Long Will You Keep This Data For And Why?

We hold student data in line with our published retention schedule ([link](#)) but as a general guide, we hold

student data while they remain at this school, after which their file and associated data is transferred to their next school (secondary or student referral unit)

or

As a secondary school, we are required to retain student data from the date of birth of the student plus 25 years.

How do you ensure the data you hold is accurate?

We have a responsibility to ensure that the data we hold is accurate and up-to-date and while we can ensure that the data the school produces about students is accurate, we must rely on parents and carers to inform us where information may change – for example if address details or contact information changes.

We take steps at the start of every new autumn term to send an information update sheet to parents and carers asking them to confirm that the information we hold is correct and, where necessary to make changes to any information that needs updating.

Should details change during the school year, we actively encourage parents and carers to notify us of those changes and not to wait to update the form the following year.

Your rights

Where we are using your personal data as a result of your contract of employment, you have varying rights depending on the legal basis for how we process your information. You can find out more about your rights in the ‘Your Data Protection Rights’ section.

Who Can I Complain To If I Am Unhappy About How My Data Is Used?

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with Miss S Oscroft steph.oscroft@epchs.co.uk or the DP Lead or the school’s Data Protection Officer:

Data Protection Officer: Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

Telephone: 0203 326 9174

Lead Contact: Craig Stilwell

DfE 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)

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.

The law requires us to provide information about our students to the DfE as part of statutory data collections. Some of this information is then stored in the national student database (NPD). The legislation that requires this is the Education (Information About Individual Students) (England) Regulations 2013.

To find out more about the student information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-student-database-user-guide-and-supporting-information>.

The department may share information about our students from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to student information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided student information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-student-database-requests-received>

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

Staff and Governor Information

Why Do You Need My Information?

As an employee or Governor of the school, we need to process personal data in order to carry out a variety of responsibilities linked to your employment or role. This includes ensuring you are paid and your pension contributions are made, for training and appraisal purposes, for monitoring equal opportunities, for emergency contact information and to assist in the general running of the school.

The School collects and processes personal data about employees and job applicants for the following purposes: -

- To determine recruitment and selection decisions on prospective employees;
- In order to carry out effective performance of the employees contract of employment and to maintain employment records;
- To comply with regulatory requirements and good employment practice;
- To carry out vetting and screening of applicants and current staff in accordance with regulatory and legislative requirements;
- Enable the development of a comprehensive picture of the workforce and how it is deployed and managed;
- To enable management and planning of the workforce, including accounting and auditing;
- Personnel management including retention, sickness and attendance;
- Performance reviews, managing performance and determining performance requirements;
- In order to manage internal policy and procedure;
- Human resources administration including pensions, payroll and benefits;
- To determine qualifications for a particular job or task, including decisions about promotions;
- Evidence for possible disciplinary or grievance processes;
- Complying with legal obligations;
- To monitor and manage staff access to our systems and facilities in order to protect our networks, the personal data of our employees and for the purposes of safeguarding;
- Network and information security, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution;
- Education, training and development activities;
- To monitor compliance with equal opportunities legislation;
- Determinations about continued employment or engagement;
- Arrangements for the termination of the working relationship;
- Dealing with post-termination arrangements;
- Health and safety obligations; and
- Fraud.

What information do we use?

The type of information the school collects, uses and sometimes shares, include:

| What do we collect? | What is it? | How do we collect it? |
|--------------------------------|--|--|
| Personal Information | This is information such as : <ul style="list-style-type: none"> • Name, title, addresses, date of birth, marital status, phone numbers and personal email addresses; • Emergency contact information such as names, relationship, phone numbers and email addresses; • Details of any dependants; | You will generally have provided most of the information on your job application with the school but may have updated and changed information over the years. We regularly ask you to update your information to make sure it is accurate. |
| Your characteristics | This includes information such as: <ul style="list-style-type: none"> • gender, • age, • nationality • ethnic group • religion. | Most of this information will have been provided when you join the school. |
| Your employment details | Obviously we hold information related to your employment at the school. This will include such things as your start date, the hours you work, the post you are employed in, past roles, training information, details of your qualifications, anytime off due to illness and of course salary details. <ul style="list-style-type: none"> • Information collected during the recruitment process that we retain during your employment including references, proof of right to work in the UK, application form, CV, qualifications; • Employment contract information such as | This information will be regularly updated over your time with the school and will include information you provided as part of your application process as well as other career development information. |

| | | |
|--|---|--|
| | <p>start dates, hours worked, post, roles;</p> <ul style="list-style-type: none">• Education and training details;• Details of salary and benefits including payment details, payroll records, tax status information, national insurance number, pension and benefits information;• Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;• Information in your sickness and absence records such as number of absences and reasons(including sensitive personal information regarding your physical and/or mental health);• Criminal records information as required by law to enable you to work with children;• Your trade union membership;• Information on grievances raised by or involving you;• Information on conduct and/or other disciplinary issues involving you;• Details of your appraisals, performance reviews and capability issues; | |
|--|---|--|

| | | |
|-----------------------------|--|---|
| | <ul style="list-style-type: none"> • Details of your time and attendance records; • Details in references about you that we give to others. | |
| Medical information | As well as details of any sickness absence you may have had, you may also have provided us with details of any illness or condition you may have or medication you are required to take. | You have provided this information voluntarily so that we are aware of how we can offer any assistance |
| Photographs and CCTV | We use your photograph on staff badges and in our employee database. As the school operates CCTV cameras, you will regularly be captured by them during the day and as you move around the school. Details of how we handle CCTV footage can be seen in this section | CCTV is captured on school property on daily basis. Where photographs of students are taken, parents are informed and consent is sought for their use. |
| Computer use | In order to safeguard the school's IT system from attack or misuse, we automatically monitor such things as websites visited, this means that if there is a problem, we can trace the accessing of inappropriate or infected material back to an individual (for example through a recorded IP address). | Monitoring of access to websites etc is automatic. |

Purpose and legal basis for collecting and using this information

The purpose for collecting and using this information is:

| Legal Basis | When | What allows us |
|------------------|---|--|
| Public Task | We are required to collect and provide information relating to the role of our Governors. | Official Authority or Public Task is covered by article 6(1)(e) of the GDPR. |
| Legal Obligation | For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take | Legal obligation is covered by article 6(1)(c) of the GDPR. |

| | | |
|---------------------|--|--|
| | periods of leave to which they are entitled. | |
| Contract | To enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide an employment contract, to pay you correctly and to administer benefit and pension entitlements. | Contract is covered by article 6(1)(b) of the GDPR. |
| Legitimate Interest | In other cases, the school has a legitimate interest in processing personal data before, during and after the end of the employment relationship. | Legitimate interest is covered by article 6(1)(f) of the GDPR. |
| Consent | There will be some cases where you give us permission to use your information and this will only be used under consent . Where we use consent we will ensure it is appropriate and that you have the right to refuse consent or withdraw consent at any time and that any decision you make to consent is a free one. | Consent is covered by article 6(1)(1) of the GDPR. |

- We also process data on criminal convictions and offences including information relating to criminal allegations and proceedings through the DBS service to carry out our legal obligations relating to the employment of individuals dealing with vulnerable young people or children. Criminal Data is processed under Article 10 of the GDPR and, Schedule 1 Pt3 - 29, 33, 36 of the Data Protection Act 2018.

Where the information we process is considered to be 'special category data' such as health data, we do so under one of the conditions of Article 9 of the GDPR. These are:

Article 9 (2)(a) -Where you have given explicit consent for this information to be used.

Article 9 (2)(b) - Where the information is required for us to fulfil our employment obligations

Article 9 (2)(d) - Where it is a legitimate activity, such as providing information to a Trade Union

Article 9 (2)(f) - Where it would be required to establish, exercise or pursue a legal claim

Article 9 (2)(g) - Where we have identified a substantial public interest, such as the safeguarding of children

Article 9 (2)(h) – Where it is required for reasons of occupational health purposes

Who will you share my information with?

We will routinely share workforce information relating to your employment with:

- The Cheshire West and Chester Human Resources team and Transactional Service Centre – Recruitment and Pay and as part of the PRIME Accident Reporting System.
- With third parties in order to:
 - Obtain pre-employment checks such as references from former employers/other organisations;
 - Undertake necessary criminal records checks from the Disclosure and Barring Service (for specifically identified posts);
 - Provide payroll services including information to pension scheme providers (Cheshire Pension Fund);
 - Provide occupational health services (People Asset Management)
 - Provide training (training organisations commissioned by us to provide training);
 - Make employee benefits available to you (benefits providers such as Sodexo and Tusker)
 - Fulfil the school's legal obligations e.g. Police, HRMC, pensions agencies, Student Loans, government agencies, Health and Safety Executive or as instructed by the Court system.

We may disclose your personal information for legitimate purposes to:

- Agencies who perform services on behalf of the school for the purposes stated above;
- Any recipient, if we are required to do so, such as by applicable court order or law;
- Any recipient, with your consent, such as for employment verification or bank loans; or
- Any recipient when reasonably necessary such as in the event of a life-threatening emergency

We regularly share additional information with:

Cheshire West and Chester Council

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment. We are required to pass information about our child and family social work workforce employees to the Department for Education (DfE) through regulations under [Section 83 of the Children Act 1989](#).

How Long Will You Keep This Data For And Why?

We are required to keep employment details for a specified period and, in line with the school's retention schedule, this is 6 years from the year you cease your employment with us. After this time, information we hold about you will be deleted from systems and paper files securely disposed of.

Your rights

Where we are using your personal data as a result of your contract of employment, you have varying rights depending on the legal basis for how we process your information. You can find out more about your rights in the 'Your Data Protection Rights'.

Who Can I Complain To If I Am Unhappy About How My Data Is Used?

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with Miss S Oscroft steph.oscroft@epchs.co.uk or the DP Lead or the school's Data Protection Officer:

Data Protection Officer: Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

Telephone: 0203 326 9174

Lead Contact: Craig Stilwell

School Visitors

A range of individuals may visit our school for a number of different reasons. Whatever reason you have for visiting us, there is certain information we may gather in order to make your visit as smooth as possible.

What information do we collect?

When you arrive at the school, our CCTV cameras will record footage as you enter our carpark and the school. This is done for security purposes. Details of why and how we record and use CCTV footage can be found in the [CCTV section](#)

When you arrive at reception we will ask you to provide us with some details which allow us to produce a visitors badge and to let your appointment know you have arrived.

We use electronic sign in system to process this information.

We collect details of your name, organisation (if relevant), any car registration, the time of your visit and the details of the person you visit.

We will use this information to produce a visitor badge that must be worn at all times. Personalised name badges are destroyed once you have left the building.

Occasionally, depending on the nature of the visit, we may also request that an individual shows a form of ID. This is simply for verification purposes and the information is not recorded.

Do I have to provide this information?

We have a responsibility to safeguard our staff and students and one of the ways we do this is to understand who is on school premises and for what purpose at any given time in order to gain access to school premises, even when chaperoned, we require you to provide this information.

Who will you share my information with?

We will only share visitor information where we are legally obliged to do so, or where we are allowed to do so under exemptions in the Data Protection Act - for example for the prevention or detection of crime or should an individual submit a request for access to information. Any such access will be approved by our Data Protection Lead or Data Protection Officer.

Purpose and legal basis for collecting and using this information

The purpose for collecting and using this information is for security and health and safety purposes. The legal basis we rely on for this is legitimate interest in that it is in the school's interest, and the interest of visitors, to ensure we know who is on site at any time. Legitimate interest is covered by article 6(1)(f) of the GDPR.

Your rights

As we are processing your personal data for the school's legitimate interest you have the right to object to our processing of your personal data. We may have legitimate reasons which mean we may refuse your request, but we would always explain this to you. If you are unhappy with how your data is used you can make a complaint and ask us to review this use See Your [Data Protection Rights](#) for more information.

How Long Will You Keep This Data For And Why?

CCTV recordings are kept for a maximum 28 days and then automatically deleted unless they have been identified as being needed for a specific purpose (see the CCTV section)

Information recorded in or electronic sign in system is kept in line with our retention schedule and is retained for 6 years. After this date, the information is destroyed/deleted. Images and car registration plate details of visitors are removed from the system after 1 year.

None of the information we collect about you will be used for any automated decisions nor will it be transferred abroad for any purpose

Website Visitors

When you visit our website we use a third-party service, Google Analytics, to collect standard information and details of visitor behaviour. We do this so we can record the number of visitors to the site and identify the most popular areas. This information is only processed in a way that does not identify you and we do not make, or allow Google to make, any attempt to find out the identity of any individual visiting the site.

If we do collect personal data at any point, for example in an online form, we will tell you and explain what we intend to do with it.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work more efficiently, as well as to provide information to the site admin. The table below explains the cookies we use and why.

We do not drop cookies by default but rely on a visitor's explicit opt in to state what cookies they are happy for us to use. This will apply to non-necessary cookies, these are cookies not required for security or functionality of the site.

| Cookie | Name | Purpose |
|------------------------------|---|--|
| Universal Analytics (Google) | _utma _utmb _utmc _utmz | These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. |
| Website - WordPress | _ga _gat_gtag _UA_189 608469_1 _gid | By default, WordPress uses cookies for authentication purposes to store session information for logged in users. It also sets a cookie when someone leaves a comment on our site. Apart from these, WordPress plugins can set their own cookies to store different information. For example, WP Favourite Posts plugin shows a user's favourite posts by storing them in a cookie. Cookie notification and option added to the website |

| | | |
|------------------|------------|--|
| Twitter Badge | | <p>Data collected includes: Anonymous (ad clicks, browser type, mobile carrier, page views, referring URLs, time/date), Pseudonymous (IP address, search queries, "tweets"), PII (device and application IDs). Data Sharing: Anonymous and aggregate data is shared with third parties.</p> <p>Data Expiry: Log data is deleted or separated from PII after 18 months.</p> |
| Facebook Connect | | <p>Data collected includes: Anonymous (browser type, location, page views), Pseudonymous (IP address, "actions taken").</p> <p>Data Sharing: Data is shared with third parties.</p> <p>Data Expiry: Data is deleted from backup storage after 90 days.</p> |
| Facebook Social | datr lu | <p>Data collected includes: Anonymous (browser type, location, page views), Pseudonymous (IP address, "actions taken").</p> <p>Data Sharing: Data is shared with third parties.</p> <p>Data Expiry: Data is deleted from backup storage after 90 days.</p> |

Purpose and legal basis for collecting and using this information

The purpose for the use of the data collected by our website is to maintain and monitor its performance so that we can improve the site and information we provide. The legal basis we rely on for this is legitimate interest in that it is in the school's interest, and the interest of website visitors, to ensure we provide a suitable website. Legitimate interest is covered by article 6(1)(f) of the GDPR.

Who will you share this information with?

We do not share any information collected by our website with any other party aside from the organisations who manage Cookies used for visitor analysis purposes.

How long will the school keep my information?

The majority of cookies are set to expire on the completion of your visit. Other cookies, used to track repeat visits expire after a set period.

Your rights

As we are processing your personal data for the school's legitimate interest you have the right to object to our processing of your personal data. We may have legitimate reasons which mean we may refuse your request, but we would always explain this to you.

See Your [Data Protection Rights](#) for more information.

Photographs

Occasionally, we may take photographs of the children at our school. We use these images as part of our school displays and sometimes in other printed publications or on our school website, Facebook page and Twitter account.

We may also include photographs in Learning Journeys and Records of Achievement that record your child's progress throughout school and these may include photographs of individuals, groups or classes of children.

We consider using photos of children as part of class or school displays in the school environment as an important part of learning and developing a sense of community amongst all students, as to demonstrate achievements.

We are clear as to how images of children can be used, especially on those occasions where they may be used outside of the school environment and seek consent from parents to allow us to use photographs in those circumstances.

We will not use any images of children in the media, in publications, online, on social media or in any promotional literature where we do not have parental consent and once a child has left our school we will no longer use their image even where consent was given.

Parents have the right to withdraw their consent for the use of images at any time.

Images used by the school

In ensuring that we always use photographs in an appropriate and responsible fashion, we will ensure that:

1. Any photo consent form is valid for the period of time your child attends Ellesmere Port Catholic High School.
2. You can withdraw your consent for the use of the images at any time by contacting the school.
3. The images we take will be of activities that show the school and children in a positive light.
4. Embarrassing or distressing images will not be used. The images will not be associated with negative or sensitive issues.
5. We may use group or class photographs or footage with very general labels e.g. 'science lesson'.
6. We will only use images of students who are suitably dressed.
7. We will make every effort to ensure that we do not allow images to be taken of any children for whom we do not have permission or who are 'at risk' or disallowed from having their photographs taken for legal or social reasons.
8. We will take all reasonable measures to ensure the images are used solely for the purposes for which they are intended. However, we cannot guarantee this and take no responsibility for the way images are used by other websites or publishers or for any consequences arising from publication.
9. Historic photographs will remain on our school website and social media feeds. We will not use the personal details or full names (which means first name and surname) of any child or adult in a photographic image or video, on our website, on our social media platforms in our school prospectus or in any of our other printed publications.
10. If we use photographs of individual students, we will not use the name of that child in the accompanying text or photo caption.

11. If we name a student in the text, we will not use an individual photograph of that child to accompany the article.
12. We may use group, team or class photographs or footage with very general labels, such as 'a science lesson' or 'making Christmas decorations'.
13. If a child has won an award or been honoured in some way and we would like the name of their child to accompany their picture we will obtain permission from the parent before using the image.
14. Individual/sibling and/or class photographs are taken annually and parents have the opportunity to buy these images but there is no obligation to do so. Images taken are not used elsewhere and returned/unpurchased images will be destroyed. Where class photographs are taken these are made available to all parents of students in that class.

Photography by families and friends

The school operates a policy in relation to the taking of photographs and filming of children by family and friends at school events and on school premises. This policy is available on our website.

CCTV

We operate a CCTV system in our school for the purpose of student, public and staff safety and for the detection and prevention of crime or anti-social behaviour. CCTV is also installed on the outside of buildings for the additional purpose of monitoring building security.

When you visit our school you will be automatically recorded by our CCTV system.

Where CCTV is in operation we post clear signs to let you know cameras are operating and who to contact should you require any further information. We also have a [CCTV policy](#) to help you understand how and why we use such cameras.

Our CCTV system is operated and maintained by our site staff.

We operate CCTV in accordance with the codes of practice issued by the Information Commissioner and the Surveillance Camera Commissioner.

How will the school use the information it collects about me?

Footage from our CCTV cameras around the school is stored securely within our CCTV system and is only accessed when we have a legitimate reason to do so. This would be to allow us to investigate any incidents of criminal or antisocial behaviour or to identify specific safeguarding risks or incidents. In order to access this information, a strict procedure must be followed and all access recorded.

Purpose and legal basis for collecting and using this information

The purpose for collecting and using this information is for security and health and safety purposes. The legal basis we rely on for this is legitimate interest in that it is in the school's interest, and the interest of visitors, to ensure we know who is on site at any time. Legitimate interest is covered by article 6(1)(f) of the GDPR.

Who will you share this information with?

We will only share CCTV footage where we are legally obliged to do so, or where we are allowed to do so under exemptions in the Data Protection Act - for example for the prevention or detection of crime or should an individual submit a request for access to footage. Any such access will be approved by our Data Protection Lead or Data Protection Officer.

How long will the school keep my information?

Under normal circumstances your information collected by CCTV around the school will be retained for up to 28 calendar days after which point it will be deleted. Any imagery required for investigative or evidential purposes may be retained beyond 28 days and is securely disposed of upon completion/conclusion of the purpose for which it has been retained.

Footage is kept in a secure environment and is only accessible by authorised personnel who have a legitimate reason to do so.

Your rights

You have the right to see CCTV images of yourself, or your child if you hold parental responsibility, and be provided with a copy of those images. You can do this by submitting a [Subject Access Request](#). We may request additional information from you so that we can identify the date footage was filmed and the possible locations at which footage was taken.

If a Subject Access Request is made we will identify and isolate the footage in order to prevent deletion. Requests made after the standard 28 day deletion point cannot be serviced. We also have cameras that do not retain images for the full 28 days and these requests will also not be serviced.

Biometric Data

The school operates the Vericool system which allows students to cashless catering via a fingerprint scanner. This identifies each individual student against previously gathered biometric data.

We comply with the requirements of the Protection of Freedoms Act 2012 whereby we notify each parent of our wish to use a biometric recognition system and seek consent to do so. In line with this act, should a student under the age of 18 refuse to participate in activities that involve the processing of their biometric data, we will ensure data is not taken. A student's objection or refusal, regardless of age, automatically overrides any parental consent to the processing of biometric data.

Where a refusal to the use of biometric data is made, we must provide an alternative solution for that student. Any student who wishes to opt out of our biometric database will be issued with a 4 digit PIN number as an alternative.

Consent for the school to use biometric data can be withdrawn at any time.

How does it work?

By taking an image of your child's biometric we can turn this information into a digital signature that can then be recognised by our systems. When the student places their biometric input on the scanner, the software matches their biometric image with the unique digital signature held in the database. Students will then be able to purchase food and check account balances by simply placing a finger on a digital scanner.

What does the law that relates to school say about biometrics?

The Information Commissioner considers all biometric information to be personal data as defined by the Data Protection Act 2018; this means that it must be obtained, used and stored in accordance with that act. The Protection of Freedoms Act 2012 changed the way that schools are allowed to use biometric data in schools and colleges when used as part of an automated biometric recognition system.

Can biometrics be used by any other agency?

No, the software we use turns your child's biometric image in to a mathematical algorithm. The image of the biometric is then discarded. The information that is stored cannot be used to recreate an image of the child's biometric.

What happens when a student leaves the School?

When a student leaves school all data relating to their biometric will be permanently deleted.

What happens to the fingerprint?

When a student registers to the biometric system, their finger is placed on to a fingerprint scanner. The fingerprint is then converted into a collection of data points via a mathematical algorithm. This data is then encrypted and stored on the student's account to be used as their unique identifier.

Are the fingerprints stored?

No. The fingerprint is only used to generate a collection of data points which is then encrypted. The fingerprint reader looks for specific patterns and unique identifiers on the finger, assigning specific data to each point - the fingerprint is never actually recorded.

Can the secure data be reversed to produce a fingerprint?

No. The data points produced by the algorithm can't be reversed to produce a full fingerprint. The data is fully encrypted to military grade standards and even if this was to be broken, trying to reproduce a fingerprint from the data points could never produce anything usable.

Is my child's data secure?

Our database is stored within the school on a secure server system. The database is fully password protected and cannot be accessed by the copying of the physical data files. The biometric data itself is encrypted within this database.

Security

In order to assure the protection of all data being processed, we will develop, implement and maintain reasonable safeguard and security measures. This includes using measures such as:

- Encryption of personal data (including the use of secure passwords);
- Pseudonymisation (this is where the School replaces information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person to whom the data relates cannot be identified without the use of additional information which is meant to be kept separately and secure);
- Ensuring authorised access (i.e. that only people who have a need to know the personal data are authorised to access it);
- Adhering to confidentiality principles;
- Ensuring personal data is accurate and suitable for the process for which it is processed.
- Employee training on data protection and information security;
- Written information security policies and procedures;
- Impact assessments and evaluation of risks to personal data;

The School follow procedures and technologies to ensure security and will regularly evaluate and test the effectiveness of those safeguards to ensure security in processing personal data.

The School will only transfer personal data to third party service providers who agree to comply with the required policies and procedures and agree to put adequate measures in place

Sharing Personal Data

The School will generally not share personal data with third parties unless certain safeguards and contractual arrangements have been put in place.

These include if the third party:

- Has a need to know the information for the purposes of providing the contracted services;
- Sharing the personal data complies with the privacy notice that has been provided to the data subject and, where required, the data subject's consent has been obtained;
- The third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- The transfer complies with any applicable cross border transfer restrictions; and
- A fully executed written contract that contains GDPR approved third party clauses has been obtained. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

There may be circumstances where the School is required either by law or in the best interests of our students, parents or staff to pass information onto external authorities, for example, the local authority, Ofsted or the department of health. These authorities are up to date with data protection law and have their own policies relating to the protection of any data that they receive or collect.

The intention to share data relating to individuals to an organisation outside of our School shall be clearly defined within written notifications and details and basis for sharing that data given.

In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

We will not share your information with any third parties for the purposes of direct marketing.

Transferring data abroad

We ensure that the majority of personal information is stored on systems in the UK. There may be some occasions where your information may leave the UK either in order to get to another organisation or if it's stored in an identified system outside of the EU and there are no viable alternatives to our using this system. Where this is the case, we will clearly make it known.

On the rare occasion where data may leave the UK, we have additional protections on your information ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party in line with legal requirements.

We'll take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU governments.

If we need to send your information to an 'unsafe' location we'll always seek advice from the Information Commissioner first.

Student Friendly Privacy Notice

What is this about?

There is a law that keeps your information safe – things like your address, date of birth and phone number. The school and other people collect and use information for all kinds of reasons, and this law tells them exactly what they are allowed to do with yours.

As your school, we collect some information about our students, like you.

It's our job to tell you how we will collect the information, how we will record it and how we will use it.

In this notice, you will see different names or terms used that you may not be familiar with, such as:

- **Data controller:** This is the school as we are in charge of the information we collect.
- **Data processor:** This is an organisation that helps us to processes information.
- **Data protection Lead (DPL):** This is the school first point of contact
- **Data protection officer (DPO):** This is the person who makes sure we do everything the law says.
- **Personal data:** This means any information that can be used to identify someone, such as your address and date of birth.

Who looks after your information?

The school is the data controller of the personal information you give us – that means we look at how and why your information is collected and used.

Sometimes the school has to give your information to other people, such as the school nurse, but it will only give away your information when you say it's ok or when the law says that they have to. When your data is given to someone else, they must look after it and keep it just as safe as we would.

Why do we collect and use your information?

We will only collect your information when we need it to help us do our job in educating you or to follow the law. When we've collected it, here's how we use it:

- To get in touch with you and your parents when we need to
- To support your learning
- To monitor and report on your progress
- To provide appropriate care and support
- To protect your welfare and follow safeguarding procedures
- To assess the quality of our service
- To comply with the law regarding data sharing

What information do we collect?

The type of information that the school collects, holds and shares include the following:

Your personal information

This is things like your name and address.

Your characteristics

This means information about you, like where you're from, what language you speak and things like that.

Your attendance information

We will record how many times you missed school and why you couldn't come to school.

Your assessment information

We collect your test results when you sit a big test or exam.

Some of your medical information

We keep information about any times you've been ill and any special conditions you have that we need to know about to keep you safe.

Your special educational needs

We collect information that helps us teach you better, such as any special or extra needs you may have.

Behavioural information

We record any incidents that have happened during school time, this could be the number of times you've been excluded and why.

Photography

Using photographs of you counts as processing your personal data. Before we take or use any photographs we will ask you (if you're old enough) or a parent to give permission for us to take and use pictures of you. We might use your pictures on display boards or on the school's website, for example.

Do you have to give us your information?

You must give us quite a lot of the information we need, but there is some information that you can choose whether to let us have it or not.

When we ask you for information that you don't have to give us, we will ask for your permission and let you know why we want it and what we will do with it. If you don't want us to have the information, that's your choice.

There may be times though, where you may not want us to use your information but we have to, and if that happens we will always tell you and explain why. If you really don't want us to use it you can ask us to show you why we need to use the information.

How long will we keep your information?

We don't keep it forever, only for as long as we need it to help us do the thing we needed it for. We have a policy that tells us when to keep it and when to get rid of it.

Will your information be shared?

We won't share your information with anyone else without your permission, unless the law says we can or should or unless we can show you that we need to so that we can do specific things. We may share information with:

- The Local Authority (the Council) – because we have to share certain information with them to make sure you are safe, healthy, happy and how well you are doing at school.
- The Department for Education when they want to know how well our students are doing
- Your family – when we tell them about anything that may have happened in school
- Our regulator, Ofsted, when they come to see how well we teach you

- Central and local government, who need to know things like how many students we have and how well you are doing
- Our auditors, who can check the number of students eligible for Free School Meals
- Survey and research organisations – but we will make sure they don't know who you are
- Suppliers and service providers – to enable them to provide the services we buy from for, which could be one of the online services you use in class:
 - Breakfast and After School club
 - Schools Sport Partnership
 - Community Sport Foundation
 - School Photographer
- The NHS – when we tell the school nurse if you need a vaccination
- Health authorities, so they can make sure you are doing well and are healthy
- Health and social welfare organisations, so they know you are safe and happy
- Charities and voluntary organisations, when we ask them to help us with school trips or events
- Police forces, courts, tribunals, if we are asked to give them information to help them do their job better
- Students' destinations upon leaving the school – if you leave to go to another school, we will tell your new school all about your time with us

Sometimes we have to share your information with the people in charge of all schools, the Department for Education (DfE). They may ask us to share things like:

- Students on roll at the school
- Attendance figures
- Performance data

They store some of their information in the National Student Database, and then share some of it with people looking to help schools and students like you. But don't worry, the database is very safe and your information won't get lost or given to anyone who shouldn't have it.

Your parents can ask us to only share your name, address and date of birth, and nothing else, by sending an email or letter to the school office. When you're 16, it's up to you to decide what information you want to share.

What can I do?

You and your parents have certain rights when it comes to the way we handle your information. And these are to:

- Be told how we use your information.
- Ask to see the information we hold.
- Ask us to change information you think is wrong.
- Ask us to remove information when it's not needed anymore.
- Ask us to only use your information in certain ways.
- Tell us you don't want your information to be processed.

If the information we are collecting is information that you can choose not to give, you can tell us to stop collecting it at any time.

If you're worried about how we get and use your information, you can speak to the Strategic Data Manager at the school, who will be able to help you and answer any questions that you have.

If you or your parents want to speak to somebody not at the school, you can contact the School's Data Protection Officer or the people who look after information, called the Information Commissioner's Office (ICO), on 0303 123 1113 or using their live chat.

Would you like to know more?

If you or your parents would like to find out more information about how we and/or the DfE collect, use and store your personal information, please visit our [website](#)

Four important things to understand

Now you've read this, we hope you understand that:

- The law allows us to get and use your information to help us do our job.
- We may share your information with others, but only when we really need to.
- We will ask for your permission to share your information whenever you have a choice.
- You can tell us not to share your information, even when you have said yes before.

If you have any questions, please contact **Miss S Oscroft, Strategic Data and Office Manager** steph.oscroft@epchs.co.uk who will be happy to help you.

School Data Map

You can access a full copy of our School Data Map via this [link](#).