

# GORDON'S SCHOOL

## Privacy Notice (How we use student and parent information)

**The categories of student and parent information that we collect, hold and share include:**

- Personal identifiers and contacts (such as name, unique student number, contact details and address)
- Characteristics (such as ethnicity, language, nationality, country of birth 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 information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as MiDYiS, KS2 data, post 16 courses enrolled for and any relevant results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Guardian contact details (Residential boarders only)

This list is not exhaustive.

### Why we collect and use this information

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

- to support student learning
- to monitor and report on student attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for the Department for Education (DfE) data collections
- to provide careers services
- to enter students for exams
- to monitor the use of the school's IT and communications systems in accordance with the school's acceptable use policy

We use the parent data:

- to respond to requests for information about joining the school
- to communicate with you

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the lawful bases we rely on for processing student information are:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;

- To provide educational services in the context of any special educational needs of a student;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring, health and safety compliance) and to comply with its legal obligations and duties of care.

### **The lawful basis on which we use this information**

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires.

The submission of student data for the school census is a statutory requirement under the Education Act 1996.

### **Collecting student and parent information**

We collect student and parent information via:

- Application form
- Common Transfer File (CTF)
- Secure file transfer from previous school
- Contact details form
- Interviews (Sixth Form only)

Student data is essential for the School’s operation use. Whilst the majority of student and parent information you provide to us is mandatory, some of it is provided to us 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 and parent data**

- We hold student data for the period of from their date of birth plus 25 years.
- If they have an Education Health Care Plan we hold student data up to their date of birth plus 30 years.
- If the student is on the child protection register and is the subject of a multi-agency plan their data will be held indefinitely.

For more information on our data retention schedule and how we keep your data safe, please contact the Data Protection Officer, Mrs Josephine Boorman, [jboorman@gordons.school](mailto:jboorman@gordons.school).

### **Who we share student information with**

We routinely share student information with:

- schools that the student attends after leaving us
- our local authority
- youth support services (students aged 13+)
- the Department for Education (DfE)
- our IT contractor (CTS)
- the School doctor (for residential boarders only)
- exam boards including for music and LAMDA
- our Careers provider
- the Combined Cadet Force (CCF) (Y10 students and those that continue beyond Y10) the purpose of this is to ensure that all cadets are insured by the MOD whilst participating in CCF activities

- colleges and UCAS where references are requested
- Return2Play (online injury management system)

### **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. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our students with the (DfE) under regulation 5 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 (DfE)**

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 regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the Department for Education (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 contact our Data Protection Officer, Mrs Josephine Boorman ([jboorman@gordons.surrey.sch.uk](mailto:jboorman@gordons.surrey.sch.uk))

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 delation 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/>

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

## **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.

## **Contact**

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

Mrs Josephine Boorman, Data Protection Officer on 01276 858084 or email [jboorman@gordons.school](mailto:jboorman@gordons.school)

**Josephine Boorman**  
**Data Protection Officer**

**Updated: January 2024**

## How Government uses your data

The student data that we lawfully share with the the Department for Education (DfE) through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

## Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education (DfE) (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

## The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD). The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department for Education (DfE).

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

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

## Sharing by the Department for Education (DfE)

The law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime
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For more information about the Department for Education's (DfE) 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 the Department for Education (DfE) to request access to individual level information relevant to detecting that crime. For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

## How to find out what personal information the Department for Education (DfE) holds about you

Under the terms of the [Data Protection Act 2018](#), you are entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the

Department for Education's (DfE) 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 the Department for Education (DfE): <https://www.gov.uk/contact-dfe>