

Privacy Policy / Fair Processing Notice - How We Use Pupil Information

Owner:NA/WAA/KAA/6AA

Date Created	Date 1st Review Due	Date Reviewed	Version	Next Review Due
May2018	May 2019	May 2019	2	May 2020
		September 2020	3	September 2021
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1) Pupil Information

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number contact details and address)
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Other categories (such as assessment information, relevant medical information, special educational needs information, exclusions / behavioural information, post 16 learning information.)
- Images for website, newsletters, reports, marketing materials.

CCTV

- CCTV is operated throughout The Swan premises in the interests for public/ employee safety. All Sixth Form and Wings Project pupils are based in The School House and Technical Suite at The Swan and all Green Room pupils may at some time be involved in activities held at The Swan and their images will be processed by the CCTV. Please note CCTV is NOT installed in the School House and Technical Suite, only public spaces. Further information is available in The Swan CIC Data Protection Policy and CCTV policy.

2) Rights of Data Subject

The Data Subject (The Pupil) has the following rights:

- o the right to be informed
- o the right of access
- o the right to rectification

- o the right to erasure (some of these rights are not going to apply due to other conditions set out in the Lawful Basis Section)
- o the right to restrict processing
- o the right to data portability
- o the right to object
- o rights in relation to automated decision making and profiling.

3) Purpose - Why we collect and use this information

Whilst the majority of pupil information provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform pupils whether they are required to provide certain information to us or if they have a choice in this.

We use the pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

4) Lawful Basis

The lawful basis on which we collect and use pupil information uses **Article 6 1a and Article 9** from the new GDPR laws as guidelines. **The Green Room obtains consent from pupils who are over 18 and parents to process their data for the specific purposes of: providing education to the pupil and safeguarding.**

5) Sharing - Who we share pupil information with and why

We routinely share pupil information with HM Government agencies including:

- Local authorities -admissions, invoicing, transport, social care
- The Department for Education (DfE) - OFSTED inspections, census
- Work experience placements - possible employees
- School / College pupils attend after The Green Room - possible college placements, attendance reporting when dual register.
- NHS - immunisation, CAMHS, speech and language therapists
- Exam boards - exam entries, and results
- Specialist practitioners - experts on pedagogical and therapeutic care
- Other government agencies required to assist in pupil care - eg CYPDS, YOT, DART, FSP EWO, YISP

We do not share information about our pupils with anyone without consent unless the law requires us to do so.

6) Storing pupil data

Pupil data is stored in Arbor Education and our website/email/curriculum/photos are stored in our Google G Suite For Education. Both of these systems are GDPR compliant. Data that is not yet entered into either of our systems eg pupils not yet on our roll, are kept in a locked cupboard behind a locked door in the school office.

Length of time The Green Room will hold pupil data - DOB of the pupil 3 - 40 years (Guidelines from [The information and Records Management Society](#)). Please refer to [data retention policy](#).

7) Requesting access to your personal data - Subject Access Request

(SAR). Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for personal information, or be given access to a pupils' educational record, contact Jane Nicholls jane@thegreenroomschool.com
The Green Room will then endeavor to help pupils and parents/carers access their data.

8) Other Rights

Pupils, Parents and Carers also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; (NOTE: the right to erasure - whilst the pupil attends The Green Room, there may be data that we would not erase if requested if it would hamper our ability to perform our public task).
- claim compensation for damages caused by a breach of the Data Protection regulations

9) Contact

If you would like to discuss anything in this privacy notice, please contact info@thegreenroomschool.com

To read our full Privacy Notice please visit our website www.thegreenroomschool.com/policies

This policy is approved by the Co-CEO of The Green Room Foundation

Date: _____

Co-CE: _____