



# Shevington High School Data Collection Guidance Booklet

The following booklet is to be read alongside the school Data Collection Booklet. The guidance below details our reasons and rationale for data collection.

## **Privacy Notice for Shevington High School**

Shevington High School is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information about pupils, in accordance with the General Data Protection Regulation (GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

### **Who Collects This Information**

Shevington High School is a “data controller.” This means that we are responsible for deciding how we hold and use personal information about pupils.

### **The Categories of Pupil Information That We Collect, Process, Hold and Share**

We may collect, store and use the following categories of personal information about you:

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special educational needs information;
- Relevant medical information;
- Special categories of personal data (including biometric data, ethnicity, relevant medical information, special educational needs information);
- Images of pupils engaging in school activities, and images captured by the School's CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;

### **Collecting This Information**

Whilst the majority of information you provide 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 you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **How We Use Your Personal Information**

We hold pupil data and use it for: -

- Pupil selection (and to confirm the identity of prospective pupils and their parents);
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;

- Assessing performance and to set targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

### **The Lawful Basis on Which We Use This Information**

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is require or permitted by law.

### **Sharing Data**

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share pupil information with: -

- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (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 pupils have attended/will attend;
- NHS;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors such as lawyers and consultants;
- Support services (including insurance, IT support, information security); and
- The Local Authority.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

### **Why We Share This Information**

We do not share information about our pupils with anyone without consent unless otherwise required by law.

For example, we share student's data with the DfE on a statutory basis which underpins school funding and educational attainment. To find out more about the data collection requirements placed on us by the DfE please go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### **Storing Pupil Data**

The School keep information about pupils on computer systems and sometimes on paper.

Except as required by law, the School only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.

If you require further information about our retention periods, please let Mr D Meekin know who can provide you with a copy of our policy.

### **Automated Decision Making**

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in limited circumstances.

Pupils will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

### **Security**

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way).

### **Youth support services**

#### **Pupils aged 13+**

Once our pupils reach the age of 13, we also pass pupil 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.

We must provide the pupils name, the parents name(s) and any further information relevant to the support services role.

This enables them to provide services as follows:

- youth support services

- careers advisers

A parent or guardian can request that only their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

### **Pupils aged 16+**

We will also share certain information about pupils 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.

### **The National Pupil Database**

The NPD is owned and managed by the Department for Education 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. 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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

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

The department may share information about our pupils 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 pupil 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 pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

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

### **Requesting Access to Your Personal Data**

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 your personal information, [or](#) be given access to your child's education record, contact Mr D Meekin.

You 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 purposes of direct marketing;
- Object to decisions being taken by automated means;
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the data protection regulations.

If you want to exercise any of the above rights, please contact Mr D Meekin in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to Withdraw Consent**

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Mr D Meekin. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Contact**

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with Mr D Meekin in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Mr D Meekin, then you can contact the DPO on the details below: -

Data Protection Officer Name: Craig Stilwell

Data Protection Officer Details: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE

Data Protection Officer Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>.

### **Changes to This Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## Photography and Image Consent

As a school, we regularly use photographs to show how our pupils and the school as a whole develop. Images can also help us illustrate and communicate with parents about upcoming events and can help advertise and market the school to prospective parents and pupils.

We are also aware that parents and pupils really enjoy being able to see their images and would like to give all pupils this opportunity.

There are a number of instances when the school may take photos of your child, specifically: -

- We publish photos on the school's website to promote the school to current and prospective parents as well as providing updates on current events;
- We publish photos on our social media accounts such as Facebook, Twitter, Instagram, Youtube to provide updates on events and news within the school. The school ensure that its privacy settings are such to limit viewing of photos to followers of the school accounts (as approved by the school);
- From time to time we put videos on our you tube channels which can be seen by subscribers to our channel;
- Within our newsletters, we may provide photos of recent events or achievements from our pupils;
- In order to promote the school, we send out prospectuses, flyers, leaflets and brochures which contain images to show life at our school. These will be sent to prospective parents;
- We may also use other promotional materials such as banners and signs which may contain photographic images for prospective parents to view;
- We may be visited by the media who will take photographs or film footage of events. Pupils will sometimes appear in these images, which may then be published in local or national newspapers, in televised news programmes and on social media sites;
- We publish photos in and around the school building to illustrate to current pupils and parents life around the school including educational materials and images of recent trips and events. These can be seen from time to time by other parents or visitors within the school;
- In promotional materials to show the history and character of the school to future generations.

We follow guidance as set by data protection legislation (mainly the General Data Protection Regulation) as well as guidance set by the Information Commissioner's Office on taking photos in schools and obtaining consent.

The data protection laws give children rights over their own data where they are considered to have the required capacity to understand their data rights. Most children will reach this level of understanding from the age of 12 and so it may be necessary for the school to obtain this consent from the child directly. If this is not suitable, the school will consider preferences set out below.

Usually pupils will not be named in the photographs unless they gain specific consent in the first instance.

Consent to using your child's images will last throughout your child's time at the school and will continue to apply for a short time after they leave (except for images published for historical purposes which may be kept for an extended period of time to show the history of the school).

We would like to seek your consent to the use of your child's images and will respect your decisions when publishing photos moving forward.

You can withdraw your consent at any time and can do so by writing to the Data Officer asking them to stop using your child's images. At that point they will not be used in future publications but we cannot prevent them from continuing to appear in publications already in circulation.

## **Biometric Cashless Catering System**

Shevington High School operates cashless catering system which uses biometric recognition (information taken from your child's fingerprint) to enable students to purchase food from the canteen.

The system provides safeguarding benefits for students and efficiency at the food serving points as no money changes hands, so students do not have to carry cash. It also removes any stigma relating to free school meals as accounts will be automatically credited, removing the need for students to carry a lunch pass.

Students are able to top up their accounts using 'revaluation and from home using a credit card or debit card using SCOPAY.

### **Biometric information and how it will be used**

Biometric information is information about a person's physical or behavioural characteristics that can be used to identify them. The school would like to take information from your child's fingerprint and use this information to enable your child to access the cashless catering system.

The system will take measurements of your child's fingerprint and convert these measurements into a template to be stored on the system. An image of your child's fingerprint is not stored. The template (i.e. measurements taken from your child's fingerprint) is what will be used to permit your child to access the system.

You should note that the law places specific requirements on schools when using personal information, such as biometric information, about pupils for the purposes of an automated biometric recognition system.

For example:

- (a) the school cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent(s) (i.e. as stated above);
- (b) the school must ensure that the information is stored securely;
- (c) the school must tell you what it intends to do with the information;
- (d) unless the law allows it, the school cannot disclose personal information to another person/body – you should note that the only person/body that the school wishes to share the information with is Cunninghams, the supplier of the biometric system. This is necessary for administration of the system.

### **Providing your consent/objecting**

As stated above, in order to be able to use your child's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be overridden if the other parent objects in writing to the use of their child's biometric information. Similarly, if your child objects to this, the school cannot collect or use his/her biometric information for inclusion on the automated recognition system.

You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent. Please note that any consent, withdrawal of consent or objection from a parent must be in writing.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. Their objection does not need to be in writing. We would appreciate it if you could



discuss this with your child and explain to them that they can object to this if they wish. In the case of objection to registration, your child may be issued with a PIN to access the system.

Please note that when your child leaves the school, or if for some other reason he/she ceases to use the biometric system, his/her biometric data will be securely deleted.

### **Further information and guidance**

This can be found via the following links:

Department for Education's 'Protection of Biometric Information of Children in Schools – Advice for proprietors, governing bodies, head teachers, principals and school staff':

<http://www.education.gov.uk/schools/adminandfinance/schooladmin>

ICO guide to data protection for organisations:

[http://www.ico.gov.uk/for\\_organisations/data\\_protection/the\\_guide.aspx](http://www.ico.gov.uk/for_organisations/data_protection/the_guide.aspx)

ICO guidance on data protection for education establishments:

[http://www.ico.gov.uk/for\\_organisations/sector\\_guides/education.aspx](http://www.ico.gov.uk/for_organisations/sector_guides/education.aspx)

### *Biometric Cashless Catering System*

#### **What is a Cashless System?**

At the heart of the cashless system there is a computer controlled by I.M.P.A.C.T. - Software. This allows the system to recognise each individual student, hold individual cash balances, record cash spent and cash received record where money is spent, on what food, on any specific date and time of day.

#### **How are pupils recognised by the system?**

Each student will have their fingerprint registered which will then be translated to an Alpha Numeric number, the image is then discarded, when used this will then enter them into the system program and identify them by a number.

#### **How is this then used to obtain a school meal?**

The student simply places their finger on a scanner at the point of sale; a display will show the server the student's name, year group and current cash balance held within the system. The selected food items will be entered into the system from an itemised keyboard while the amount spent and the new cash balance will show on the display.

#### **How is money entered into the system?**

By 'Cash Coin and Note' into an automatic cash revaluation terminal located in the school which is set to accept £20 £10 £5 notes £2 - £1 - 50p - 20p - 10p coins. (1p – 2p – 5p coins, cannot be used)

#### **How does the revaluation station work?**

Firstly the student places their finger on the scanner mounted on the Revaluation Station to enter the I.M.P.A.C.T system which will display the student's name and current cash balance held within the system.

The second stage coins are inserted into the slot. Each incremental cash balance will show on the display. Press the red button to tell the system that the transaction is completed.

#### **How will the student be able to check what the current cash balance is held in the system at any one time?**

- (a) By using the revaluation station. Place their finger on the scanner display the current cash balance. There is no need to deposit any money, just press the red button to finish.

- (b) Also a Remote Display at the point of sale will show the new cash balance when the food service is finished.
- (c) Balances can be viewed by logging into your Squid account, both the balance and activity is available online.

**If we pay for a set number of school meals, can it be spent in one day?**

No, a daily spend limit of **£7.00** will be set for all students and no food above that limit can be bought. On request, an individual student limit of your choice could also be set, to include a school dinner and break time snacks.

**What if the student does not hold a sufficient cash balance one day to pay for a school dinner?**

No student is refused a school dinner because they have not brought their dinner money to school with them. The school will allow for the student to loan money for one day. However, just as before, the student would be expected to bring some money with them the next day to repay the loan and re-credit the system by using the revaluation station.

**What about students entitled to a 'free school meal'?**

The system works exactly the same for all students whether they pay or have a free school meal. All students have their own account to use in exactly the same way. The amount allocated for the free school meal will be entered into the system by the software daily and will only be accessible at dinner break.

The system will then allow on a daily basis the required cash amount for each individual student to be allotted to their current cash balance. However, any under spend or missed dinner will be identified by the system and will not be added to the next day's balance.

The student can also add extra cash on to his or her balance in the system by using the revaluation station, to enable a greater daily spend on the school dinner than allocated by their free meal allowance. As this allowance can only be spent on a school dinner, extra cash added into the system can also be used for break time snacks.

**What is meant by 'dietary control'?**

Should the student have a specific food allergy, or be a diagnosed diabetic, this medical information can be coded into the system, preventing foods with allergy ingredients from being served to a particular student, by automatically locking out relevant buttons on the keyboard.

**Will students have problems in using this system?**

Some students may find it difficult to control their accounts for the first couple of weeks, but because of a daily spend limit, most learn this important life skill very quickly and will enjoy being in control of their account.

**Will we be able to have any information on how the system is being used?**

Reports can be obtained from the system giving comprehensive information on all aspects of use for each individual student as well as each day's service. These reports can be for a specific day or between any dates you wish, they will be dated and timed to the minute, and can be obtained from the Catering Department.

- (a) To show every item of food served and the total cost of each serving.

- (b)** Individual payments made direct to the school by cheque or cash and manually entered into the system.
- (c)** Each payment made by cash at the revaluation station by the student and if required, even the number of individual coins and the denomination.
- (d)** A total overview to show the date, time and location with cost of each purchase, value of all manual cheque or cash payments, value of all cash deposited in the revaluation station and current cash balance

## School Trips

On entry we ask parents to complete a data collection form. Included in this are a number of permission boxes, one of which relates to school trips.

As advised by the local authority, we can gain permission for your child to attend all standard trips on entry through the data collection form. This includes trips such as zoo's/theme parks/theatre visits etc. Included on the data collection form is a number of tick boxes one of which relates to the school trips policy.

By ticking and signing this box you are confirming that you give permission for your child to attend all standard educational visits throughout their school life. If you consent to this, you will receive an information letter regarding every visit that your child is invited to but you will not be required to complete any additional paperwork. The only exception to this will be if your child is invited to a residential visit or a visit involving adventurous activity. This type of trip will require a separate consent form specific to this trip to be completed.

You are also confirming that all of the information that you have provided us with is accurate to the best of your knowledge and take responsibility for informing us of any changes to this data to ensure that school records are up to date.

If you do not consent to the above, please make sure that you make this clear on the data collection form and we will ensure that you are provided with a separate consent form to complete for each trip.