

Thomas Jones Privacy Notice

Parent/Carers and Children

Introduction

Thomas Jones school collects and uses personal data under the Data Protection Act, 1998, the Education Act, 2011, and in line with the General Data Protection Regulations (GDPR), 2018. This Privacy Notice provides you with details of how we collect and process your personal data and that of your children in line with this legislation.

As a data controller we are responsible for ensuring the security of all personal data processed.

We have appointed a Data Protection Officer (DPO) who is in charge of privacy related matters at the school. If you have any questions about this privacy notice or the processing of your personal data or that of your child please contact the Data Protection Officer or Deputy at:

Thomas Jones School
St Mark's Road
London
W11 1RQ
0207 7271423
info@thomasjones.co.uk

Data Protection Officer: Emma Jones

Deputy Data Officer: Janice Hall

Individual Rights

The General Data Protection Regulations (GDPR) set out certain rights of the individual in relation to personal data. These include the right to:

- Be informed
- Have access
- Rectify their data (make changes to personal data)
- Deletion of their data (if not required by lawful basis to perform a task in the public interest)
- Restrict use of data
- Data portability (the right to obtain and reuse personal data for their own purposes)
- Object to data processing
- Not be subject to automated decision making including profiling.

Please contact the school if you wish to exercise any of these rights.

Personal Data We Process

Personal data means any information capable of identifying an individual.

Categories of personal data that we process include:

- **Identity and Contact Data** (such as name, marital status, date of birth, gender, unique pupil number, contact details and address)
- **Characteristic Data** (such as ethnicity, language, free school meal eligibility)
- **Safeguarding Data** (such as professional involvement, court orders)
- **Special Educational Needs and Disabilities (SEND) Data** (such as needs and ranking)
- **Medical and Administration Data** (such as doctors information, health issues, dental health, allergies, medication and dietary requirements)
- **Attendance Data** (such as absences and reasons for absence, previous schools attended)
- **Assessment and Attainment Data** (such as KS1 and 2 SATs test results, phonics check, multiplication check, assessment test results, attainment trackers)
- **Behaviour Information** (such as incident reports, behaviour plans, exclusions)
- **Transaction Data** (such as records of uniform purchased and ParentPay transactions)
- **Evaluation Data** (such as parental and pupil feedback on aspects of the school)
- **Photo/Video Data**

This list is not exhaustive, to access the current list of categories of information we process please see our Data Protection and Freedom of Information Policy, Appendix 1, Data Audit, available on the

school website.

Reasons for Collecting and Processing Personal Data

At Thomas Jones we collect and use personal data for the following purposes:

- To support pupil learning
- To monitor and report on pupil attainment and progress
- To provide pastoral care
- To assess the quality of our services
- To keep children safe
- To meet our statutory duties placed upon us by the Department for Education
- To comply with the law regarding data sharing

Lawful Basis for Processing Data

Under the GDPR, we rely upon lawful bases to process the above pupil information. See table below for details.

Type of Data	Purpose/ Processing Activity	Lawful Basis for Processing	Who processes data?	Storage
- Identity and - Contact Data - Behaviour Information - Evaluation Data - SEND Data - Attendance Data - Photo/Video Data	- Support for pupil learning	- Public Task - Consent	- Teachers - Administrative staff - SEND coordinator - DPO	- School's information management system - Paper files kept in locked cupboards
- Identity and Contact Data - Characteristic Data - SEND Data	- Monitoring and reporting on pupil attainment	- Public Task - Special Category Data	- Teachers - Administrative staff - SEND coordinator	- School's information management system - Data for DfE is electronically held - Test results held in assessment files - Paper files kept in locked cupboards
- Identity and Contact Data - Characteristic Data - Safeguarding Data - Medical and Administration Data - Behaviour Information - CCTV	- Keeping children safe	- Legal Obligation - Vital Interests - Public Task - Special Category Data (processing is necessary to protect the vital interests of the data subject or for the provision of health and social care)	- Teachers - Safeguarding lead - Administrative staff - DPO	- Paper files kept in locked filing cabinets. - CCTV recordings held on the CCTV master system

- Identity and Contact Data - Characteristic Data - SEND Data - Medical and Administration Data - Attendance Data - Behaviour Information	- Providing pastoral care	- Public Task - Special Category Data (processing is necessary for the provision of health or social care or treatment)	- SEND coordinator - Safeguarding lead - Teachers - Administrative staff - DPO	- School's information management system - Paper files kept in locked cupboards
- Identity and Contact Data - Characteristic Data - Safeguarding Data - SEND Data - Medical and Administration Data - Attendance Data - Behaviour Information - Transaction Data - Evaluation Data	- Meeting statutory duties	- Public Task - Special Category Data (processing is necessary to protect the vital interests of the data subject and for statistical purposes)	- Teachers - Administrative staff - SEND coordinator - DPO	- School's information management system - Paper files kept in locked cupboards
- Characteristic Data - Attendance Data - Evaluation Data	- Assessing the quality of our services	- Public Task - Special Category Data (processing is necessary for statistical purposes)	- Leadership team - Administrative staff - DPO	- School's information management system - Paper files kept in locked cupboards

We may process personal data for more than one lawful basis. If you require further details of personal data being processed and the lawful basis for processing this data please see our Data Protection and Freedom of Information Policy on the school website.

Personal Data Collection and Storage

We collect personal data via our admissions forms or secure file transfer from another school. Whilst the majority of pupil information you provide us with is mandatory, some of it is requested on a voluntary basis. In order to comply with the GDPR we will inform you at the point of collection if data is optional, for you to make the decision to share or not.

At Thomas Jones data is stored electronically on secure systems and paper documents are stored in locked filing cabinets or cupboards within the school offices.

Sharing of Personal Data

We do not share personal information without consent unless the law and our policies allow us to do so. From time to time we are required to share data with the Local Education Authority and the Department for Education to contribute to local and national statistics and to support school funding, educational attainment policy and monitoring. This is in line with the Education Regulations, 2013. Information may also be shared with third party processors (see below) and is passed on to future schools. Sharing data has the lawful basis of public task. All data is transferred securely.

The National Pupil Database (NPD) is owned and managed by the DfE and holds information about

pupils in schools in England. This information is securely collected from a range of sources including schools. We are required by law to provide information about our pupils to the DfE. Some of this information is then stored in the NPD. The law that allows this is the Education (Information about Individual Pupils) Regulations 2013. The Department has robust processes in place to ensure the confidentiality of our data is maintained. Decisions on whether the DfE releases data to third parties are subject to a strict approval process. 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:
www.gov.uk/data-protection-how-we-collect-and-share-research-data

In addition we need to share personal data with third party processors for the purposes set out within this privacy notice, such as ParentPay, the school nurse, NHS or our catering team. We only allow processors to process your personal data for specified purposes and in accordance with our instructions and in line with the GDPR. All processors have to provide us with their privacy notice detailing compliance with the GDPR or sign a Data Sharing Agreement with the school. See the Data Protection and Freedom of Information policy for full details of third party processors.

Access to Personal Data

Under the data protection legislation, parents/carers on their own behalf or on behalf of their child have the right to request access to their personal information that we hold. We ask that all such requests are put in writing addressed to the school or via email, where they will be dealt with as a Subject Access Request. See Data Protection and Freedom of Information Policy for full details.

Data Retention

Personal data will only be retained for as long as necessary to fulfil our processing purposes. In determining appropriate retention periods for personal data we consider the amount, nature and sensitivity of the data, risks of harm from disclosure of data, purposes for which we process data and applicable legal requirements.

Rectification and Withdrawal of Personal data

All parents/carers must ensure any information they provide is accurate and up to date. Please let us know, if at any time, your personal information changes by person at the school office or by emailing us at the address above. A data rectification form will be completed and your data will be updated.

As a maintained school much of the data we process is required by law and cannot be withdrawn however if you do wish any of your personal data to be withdrawn and destroyed, please contact the school office where a data withdrawal form will be completed and we will inform you whether your data can be deleted and securely disposed of.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorised way, altered or disclosed. Only members of staff that have a duty to process data will have access to this along with third party processors on our behalf. They will only process your personal data on our instructions in line with the GDPR and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Object to Data Processing

If you are not happy with any aspect of how we collect and use your data, we ask that you raise your concern with us in the first instance so that we can try to resolve any matters for you. If your concerns are not addressed you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

If you would like to discuss anything in this privacy notice please contact the school Data Protection Officer, detailed above.