



The Gryphon Trust

Parent-Student Privacy

Notice

POLICIES AND PROCEDURES PROFORMA

Subject and Version of Document:	Parent-Student Privacy Notice
Author:	Miss Milligan
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By whom agreed:	Board of Directors
Copy obtainable from and/or distribution:	Trust IT Manager

Amendments Summary:

Amend. No.	Issued	Page	Subject

1.0 Aims

- 1.1 The GDPR, General Data Protection Regulation came into force in May 2018. This affects The Gryphon Trust as we process personal data about staff, students, parents and suppliers.
- 1.2 Our Trust works to collect and use personal information fairly and transparently.
- 1.3 A privacy notice helps us to describe all the privacy information that we make available or provide to individuals when we collect information about them
- 1.4 Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

2.0 Data Controller

- 2.1 The Gryphon Trust processes personal information relating to pupils, staff, parents, suppliers and visitors, and, therefore, is a data controller. The Arnewood School and Eaglewood School are both responsible for GDPR compliancy under the Gryphon Trust.
- 2.2 The Gryphon Trust is registered as a data controller with the Information Commissioner's Office and renews this registration annually, registration reference Z2600946.

3.0 Data Protection Officer (DPO)

- 3.1 The data protection officer for the Gryphon Trust is:
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

4.0 Data Subject

- 4.1 The Data Subject is the person whose personal data is held or processed e.g. a student. Data Subjects have rights under the GDPR:
 1. The right to be informed
 2. The right of access
 3. The right to rectification
 4. The right to erase
 5. The right to restrict processing
 6. The right to data portability
 7. The right to object
 8. Rights in relation to automated decision making and profiling

5.0 Pupils Personal Data

- 5.1 We hold personal data about pupils to support teaching and learning, to provide pastoral care, for data collection purposes under the Education Act 1996 and to assess how the Trust is performing. We may also receive data about pupils from other organisations including, but not limited to, other schools, local authorities and the Department for Education.

- 5.2 This data includes, but is not restricted to:
- Contact details
 - Date of birth
 - Results of internal assessment and externally set tests
 - Target grades
 - Data on pupil characteristics
 - Exclusion information
 - Details of any medical conditions
 - Behaviour including incident and isolation reports
 - Safeguarding Events
 - Attendance
 - Examination coursework and material, including appeals
 - Special Education Needs, Pupil Premium, EAL, Free School Meals entitlement and Gifted & Talented Details
 - School photo
 - EHIC & Passport details for relevant school trips
 - Intervention documents
 - Leavers destinations for year 11 students & sixth form
 - Confidential Pastoral Information
 - Child services/police data
 - Timetables
 - Access arrangements
 - EHIC & Passport details for relevant school trips
 - Progression details during extra-curricular clubs
 - Contact details for the student's emergency contacts
 - Parent/carer contact details with parental responsibility status
- 5.3 For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications
- 5.4 Academy Trusts are designated as public authorities for the purposes of Freedom of Information Act queries. There is no separate definition under the GDPR for a 'public authority' therefore the collection and processing of the data outlined above is necessary for the performance of a task carried out in the public interest and in the exercise of official authority vested in us. Also known as the 'public task' lawful basis for processing by the ICO.
- 5.5 We will not share information about pupils with anyone without consent unless the law and our policies allow us to do so. Individuals who wish to receive a copy of the information that we hold about them/their child should refer to the section 'Subject Access Request' of this notice.
- 5.6 The Trust's public services provided require us to pass certain information about pupils to specified external bodies, such as our local authority, youth support services, learning platform provider (Firefly and Microsoft platforms), student management systems (Arbor/CPOMS) and the Department for Education, so that they are able to meet their legal statutory and contractual obligations. Where consent is required students and parents/carers are requested to consent to this beforehand.
- 5.7 A parent/guardian can request that only their child's name, address and date of birth be passed to Hampshire County Council by informing Mr Pressnell, Headteacher, The Arnewood School or Mr N Himmel, Headteacher at The Eaglewood School. This right is transferred to the child once he/she reaches the age 16. For more information about services for young

people, please go to our local authority website

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/supportyoungpeople>

- 5.8 We are required, by law, to pass some information about our pupils to the Department for Education (DfE). This information will, in turn, then be made available for use by the Local Authority.
- 5.9 DfE may also share pupil level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the GDPR.
- 5.10 Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are 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 level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.
- 5.11 For more information on how this sharing process works, please visit:
<https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>
- 5.12 For information on which third party organisations (and for which project) pupil level data has been provided to, please visit:
<https://www.gov.uk/government/publications/national-pupil-database-requests-received>
- 5.13 If you need more information about how our local authority and/or DfE collect and use your information, please visit:
- Our local authority at
www.hants.gov.uk/socialcareandhealth/childrenandfamilies/accessrecords;
Childrens Services Subject Access Request Team
2nd Floor North
E11 Court
Winchester
SO23 8UG
Email: childrens.services.sar@hants.gov.uk
Phone: 0300 555 1384
 - The DfE website at
 - <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>
- 5.14 The other external companies that personal data may be shared with are under the processing reason of ‘public task’ apart from the Trust-e/School Cash Office which is required under ‘consent’:

Shared with	Type of data shared	Reason for sharing
Arnewood to Firefly – The Arnewood Learning Platform	Student names, timetables, photos (if approved when student started) and work created by the individual	To provide a platform to receive work and homework from teachers and allow students to follow a timetable within school
Arnewood to Biostore Software And Tucasi School Cash Office	Student name, number Parent/carer details and payment details	Required to top up canteen balance for the child. Optional to use, cash can be brought into the finance office if preferred
Arnewood & Eaglewood to Microsoft – Office365	Student accounts, full name, user name, emails, timetables	Any data within Office 365 is within the UK under our private accounts

Arnewood & Eaglewood to Arbor	Student details, timetables, grades, behavior, rewards	To plan timetables for the students and monitor of progress and attendance
Arnewood & Eaglewood to CPOMS	Student details, child protection data, track referrals	Management of child protection and similar incidents and actions. To also track referrals to external agencies.
Arnewood to 4Matrix	Student details, assessment data, reports	For progress monitoring and intervention, reporting results to inform planning and teaching
Eaglewood to Renaissance Learning	Student details, assessment data, reports	For progress monitoring and intervention, reporting results to inform planning and teaching
Arnewood to Seneca Learning	Student name and school email address	For exam board specific revision tasks, to access for class work and homework
Arnewood & Eaglewood to the Police and other law enforcement agencies via CyberAlarm	Student online activity from each School to the Police and other law enforcement agencies	To monitor and be aware of suspicious online activity from our School networks, helping to keep our systems and data secure
Arnewood & Eaglewood to IRIS Financials	Names, Addresses and Bank Details	Accurate financial management for bursaries and refunds for parents, carers and students
Arnewood to Unifrog	Name, title, form group, email address, date of birth, postcode and gender (optional). Details of education and academic performance, education and career interests. The student's activities including their academic extracurricular activities, detail on competency skills, interactions which detail their work experience, details of the student's referees.	To enhance the teaching & learning that is taking place in school and to develop strategies for students to record and collate progression.

6.0 Special Category Data

6.1 We also collect 'Special Category Data' for pupils, including;

- Race
- Ethnic Origin
- Language
- Country of birth
- Nationality
- Biometric

6.2 This type of personal data is classified as 'Special Category Data', which the GDPR says is more sensitive and therefore requires more protection.

- 6.3 The lawful basis for processing this special category data is ‘consent’. This means the pupil or their parent has opted in to give permission to share this data with the Trust. Whilst it is not possible for a parent/guardian or an individual pupil to opt out of the school census collection, they do have the right to decline to provide data on pupil nationality, ethnicity, language and country of birth. Where this right is exercised, the information is returned in the census using the code ‘refused’.
- 6.4 The condition for processing the special category data, listed above, under Article 9 of the GDPR is *‘the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.’*
- 6.5 Pupils and/or their parents/carers have the right to withdraw this consent at any time by informing the school in writing of this withdrawal of consent. The Gryphon Trust will then confirm the personal data has been removed within 30 days and will ensure to inform any applicable third parties without undue delay.
- 6.6 The other type of special category personal data we collect and process for pupils is:
- Health information
- 6.7 The purposes of processing health information are to ensure staff are aware of any medical conditions the Gryphon Trust staff need to be aware of in pupils, to ensure that the Trust are able to minimize risks to pupils and ensure their safety whilst at school.
- 6.8 The lawful basis for processing this special category data is ‘Public interest’ and the condition for processing this special category data is *‘processing is necessary for reasons of substantial public interest’*.

7.0 Consent

- 7.1 In the pupils & staff data sections above there are some personal data categories that are provided with the individuals consent.
- 7.2 This consent is requested by the data subject, or their parents/carers where applicable, at the start of their application to the Gryphon Trust. This consent status, and associated data, is then reminded to individuals on a yearly basis. Consent can be removed at any time but the yearly reminders are in place to ensure any data The Gryphon Trust keeps is kept as up to date as possible. This data check reminder is sent to all pupils/carers/parents and staff on a yearly basis.

8.0 Retention Schedule

- 8.1 All personal data collected and processed by The Gryphon Trust is kept for a static amount of time, depending on the type of data, and then securely disposed of. This includes both electronic versions and hard copies. Please refer to the Gryphon Trust Data Retention Schedule for full details.

9.0 Transfer of Data

- 9.1 The Gryphon Trust may only transfer data outside of the EEA where the organization receiving the personal data has provided adequate safeguards, this may be through legally binding agreements, data protection clauses or if the transfer is subject to suitable safeguards put in place by the organization to protect the data. We will share with you any such occurrences.

- 9.2 The only current occurrence of this is data on the Gryphon Trust & schools of the Gryphon Trust official websites that contain information and images of data subjects. Putting data on a website may result in transfers to countries outside the EEA. The transfer will take place when someone outside of the EEA accesses the website.
- 9.3 This type of personal data placed on the school's websites is through consent of the data subject and/or their parent/carers. You have the right for this information to be revoked at any time. Please see the next section in this notice for full details.

10.0 Requesting Access to Your Data

- 10.1 Under data protection legislation, parents/carers, staff 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 an employee or educational record, contact:
The 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
- 10.2 This request for data is called a 'Subject Access Request (SAR)'. Once this is received in writing who you would like the information on, a contact number and email address, and details of the data you would like to see, the Data Protection Officer will confirm receipt of the request and where possible and applicable, will issue the requested data within 30 days. Please view The Gryphon Trust Data Protection Policy for any further details on this process.
- 10.3 You can also request this through the Judicium form online here:
[https://www.jedu.co.uk/secure/informationrequest/\\$2y\\$10\\$QVGJLOaRsiJIC2kHJP8kIu7YwE7bCEaOpRJY1t17sIqTuFiMC0f2S8](https://www.jedu.co.uk/secure/informationrequest/$2y$10$QVGJLOaRsiJIC2kHJP8kIu7YwE7bCEaOpRJY1t17sIqTuFiMC0f2S8)
- 10.4 Or for any Freedom of Information requests, please use this form:
[https://www.jedu.co.uk/secure/informationrequest/\\$2y\\$10\\$grvJu1Fcxsbts4ZMS3y3COrLHRvNMwT5mxEIk7g8IXhFE43HBp](https://www.jedu.co.uk/secure/informationrequest/$2y$10$grvJu1Fcxsbts4ZMS3y3COrLHRvNMwT5mxEIk7g8IXhFE43HBp)
- 10.5 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 purpose 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
- 10.6 If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance.
- 10.7 Alternatively, you can contact the Information Commissioner's Office at
<https://ico.org.uk/concerns>

11.0 Request to Change or Erase Data

- 11.1 The GDPR has introduced a right for individuals to have personal data erased. This is also known as 'the right to be forgotten'. This right is not absolute and only applies in certain

circumstances. Most of the data that The Gryphon Trust collects is due to a public task we perform and therefore a lot of data is unable to be erased, but individuals can make a request for erasure verbally or in writing. The Gryphon Trust will respond to this within 28 days.

- 11.2 If the Gryphon Trust have data that is incorrect on a data subject, we encourage data subjects to ensure any data they provide us is kept up to date. Once data is collected, students and parents/carers then have the right to change this data with The Gryphon Trust either in person or in writing. Links are also available on the corresponding school's website.

12.0 Contact

- 12.1 If you would like to discuss anything in this privacy notice, please contact the Gryphon Trust Data Protection Officer -
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Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
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