



GDPR

Privacy Notice for Website

Agreed by Management Committee

Chair of Management Committee:- Mr Philip Taylor

Signature:

Date: 3rd July 2019

Date adopted: July 2019

Last reviewed June 2019

Next review: June 2020

Legal updates may precipitate changes

Version: Final



Version 1 – June 2019

**Owner: Brent Council Data Protection Officer on behalf of
Ashley College
Review Date: June 2020**

Version control table

Version Number	Date	Purpose / Change	Reviewer / Authoriser
1.0	12/03/2018	Original template	Information Governance Team
2.0	01/06/2019	Update	Information Governance Team

Privacy Notice Template for website

Using this template

This template has been developed using the Information Commissioner's Office (ICO) privacy notice guidance, and the Department for Education's privacy notice model documents.

Read through this document and make changes as instructed in

How we use your information

Our privacy notices explain what to expect when Ashley College collects personal information. In this notice Ashley College, The Pavilion, Ashley Gardens, Wembley, HA9 8NP is the data controller as defined by Data Protection legislation.

Our Data Protection Officer is:

Rajesh Seedher

020 8937 2018

school.dpo@brent.gov.uk

Data Protection Officer, Brent Council, Civic Centre, Engineers Way HA9 0FJ

The purposes of processing this personal data

Your information is collected for the purpose of:

- Providing education, training, welfare, and educational support services
- Administering school property
- Maintaining the school's accounts and records
- Financial Information (e.g. fundraising or bursary assessment)
- Supporting and managing the school's employees and their data
- The school also use CCTV systems to monitor and collect visual images for security and the prevention of crime
- Meetings or events attended

The detailed purposes, categories of people, categories of personal data to be processed, legal justification, retention and information sharing can be found on the schools Record of Processing Activities. A copy can be obtained from our Data Protection Officer.

The lawful basis on which we use this information

We collect and use information under one or more of the following legal basis.

- Legal obligation – we need to process your information to comply with the law
- Public task – we need to process your information to carry out the task to provide you with an education
- Contract – we need to process your information as part of a contract such as contract of employment.
- Consent – we need your permission to use your information

Where we require consent to use your information we will make it clear when we ask for consent and explain how to go about withdrawing your consent.

We collect and use pupil information under section 537A of the Education Act 1996, and section 83 of the Children Act 1989. We also comply with Article 6(1)(c) and Article 9(2)(b) of the General Data Protection Regulation (GDPR) 2018:

We collect and use special categories of information for the following reason:

- The processing is necessary for reasons of substantial public interest.

[<https://www.gov.uk/education/data-collection-and-censuses-for-schools>]

Categories of personal data

The categories of information we may process include:

- Name and personal details (such as name, unique pupil number and address)
- Family, lifestyle and social circumstances
- Financial details
- Education details
- Employment details
- Student and disciplinary records
- Vetting checks
- Goods and services
- Visual images, personal appearance and behaviour

We also process sensitive classes of information that may include:

- Physical or mental health details
- Racial or ethnic origin
- Religious or other beliefs of a similar nature
- Trade union membership
- Sexual life
- Offences and alleged offences

We may process personal information about:

- Students and pupils
- Advisers and other professional experts
- School staff
- Members of school boards
- Donors and potential donors
- Suppliers
- Complainants and enquirers
- Individuals captured by CCTV images

Where necessary or required, we may share information with:

- Education, training, careers and examining bodies
- School staff and boards
- Family, associates and representatives of the person whose personal data we are processing
- Local and central government
- Healthcare professionals
- Social and welfare organisations
- Police forces
- Courts
- Current, past or prospective employers
- Voluntary and charitable organisations
- Business associates and other professional advisers
- Suppliers and service providers
- Financial organisations
- Security organisations
- Press and the media

We will not adopt automated decision making, including profiling.

We do not process your information with third countries outside of the UK or EU zone without the safeguards being in place that are equivalent to the Data Protection Act 2018 or the General Data Protection Regulations (GDPR).

If you fail to provide the personal data, we may not be able to deliver accurate services to you, and may also take action if it is required to do so by law.

The National Pupil Database (NPD)

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>

Your rights

Individual rights under the Data Protection legislation.

1. The right to be informed

This is your right to know about how your data is being processed, who it is given to, for what purpose and anything else that guarantees your rights. This web page provides a summary, the 'Record of Processing Activities' gives further details. When you provide information we will ensure that you have a Privacy Notice.

2. The right of access

You have a right to access your personal data and relevant supplementary information. This is known as a 'Subject Access Request'. Further information can be found at www.ico.org.uk. You can make a request by emailing the Data Protection Officer at school.dpo@brent.gov.uk. You should receive a response within 30 days, unless a different period applies as described under the ICO's Subject Access code of practice.

3. The right to rectification

You have the right to have your personal data rectified if it is inaccurate or incomplete. You can do this by contacting the service area that you are concerned about directly. Otherwise you can make a request by emailing the Data Protection Officer at school.dpo@brent.gov.uk

4. The right to erasure

This is also known as "The Right to be Forgotten". Please note that there are circumstances when your information cannot be erased. This includes situations whereby the school is required to retain information for statutory purposes in accordance with its data retentions policy. You can make a request by emailing the Data Protection Officer at school.dpo@brent.gov.uk. You should receive a response within 30 days.

5. The right to restrict processing

You have a right to request the school to 'block' or 'supress' processing of your personal data. Please note that this may not apply for most of the school's processes because there is usually a legal duty to process information.

6. The right to data portability

You have the right to obtain and reuse your personal data for your own purposes. You can make a request by emailing the Data Protection Officer at school.dpo@brent.gov.uk, or in writing to the Data Protection Officer, Brent Council, Civic Centre, Engineers Way HA9 0FJ.

7. The right to object to processing

You have the right to object to processing for certain circumstances as listed by the ICO at www.ico.org.uk. You can make a request by emailing the Data Protection Officer at school.dpo@brent.gov.uk

8. Rights related to automated decision making including profiling

There are restrictions on automated decisions based solely on automated means without any human involvement. Also there are restrictions on profiling. You can make an enquiry by emailing the Data Protection Officer at school.dpo@brent.gov.uk.

Change of Details

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify Ashley College of any significant changes to important information, such as contact details, held about you.

Concerns about data protection

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with our 'Designated Data Protection Officer' in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

You can raise your concern by emailing the School's Data Protection Officer at school.dpo@brent.gov.uk, or in writing to the Data Protection Officer, Brent Council, Civic Centre, Engineers Way HA9 0FJ.