

How we use Pupil & Parent Data

The BRIT School is committed to protecting your privacy and being transparent about what we do with it. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information. We will not do anything with your information you wouldn't reasonably expect. We will use the information that we collect about you in accordance with the Data Protection Act 2018, aligned with the General Data Protection Regulation (EU) 2016/679 (GDPR).

The BRIT School is the data controller for all Pupil and Parent/Guardian data collected, processed, and handled.

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

Personal Data:

- **Personal information:** name, unique pupil number, address, telephone number(s), email address, onward destinations
- **Assessment Information:** results, comments, feedback, examination information and results
- **Photographic & Video Footage:** Used for assessment and examination evidence, as well as in work produced by the pupil directly – images and footage created for this purpose will not be shared publicly or used for marketing and advertising without your specific consent. Please see our 'Data Protection Policy: Student image – Photography & Video' document for further information. This can be found in the Data Protection section of our website (www.brit.croydon.sch.uk/dataprotection).

Sensitive Personal Data:

- **Characteristics:** date of birth, ethnicity, language, nationality, country of birth, free school meal eligibility, English as a Foreign Language, Pupil Premium eligibility
- **Medical Information:** relevant conditions, treatments, allergies, medication
- **Special Educational Needs (SEN) Information:** assessment, provision, needs, and statement, Educational Healthcare Plans (EHCP)
- **Behavioural Information:** exclusions, measures, concerns
- **Child Protection Information:** reports, investigations, and outcomes of any child protection concerns

Sensitive Personal Data provided on a voluntary basis:

Child Adolescent and Mental Health Services (CAMHS): EWO, Social Worker, Guidance Clinic

Children in Care/Living Independently: Nature of care/living, contact, or borough information

Data is collected from the Pupil and/or Parent/Guardian when applying to The BRIT School. Additional data is collected if an applicant is successful.

The categories of Parent/Guardian information that we collect, hold and share:

Personal Data: Primary and Secondary contact - name, address, telephone number(s), email address; relationship to pupil, alternative/nominated emergency contact(s); your occupation and professional activities, philanthropic activity and memberships; records of pledges, donations and Gift Aid status, where applicable (as required by HMRC); information about your wealth, including net worth; media articles about you; Details of businesses you are or were a Director of.

Sensitive Personal Data: Date of Birth*, National Insurance Number**, Bank details including, bank account number, sort code and account name. For the purpose of processing school fee payments and issuing relevant refunds.

CCTV Images

The BRIT School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff, and visitors, and to prevent the loss or damage to school property.

Please refer to our CCTV Policy for further information. This can be found at www.brit.croydon.sch.uk/policies

Why we collect and use your data

We use the pupil data to:

- Support pupil learning;
- Monitor and report on pupil progress;
- Provide appropriate pastoral care;
- Assess the quality of our services;
- Enable examination reporting and results;
- Maintain contact and notifications for work and assignments;
- Communicate on performances and all other creative and performing arts services provided by the school;
- Comply with the law regarding data sharing, including sharing for School Census

We use the parent/guardian data to:

- Comply with the law regarding data sharing;

- Report on pupil progress;
- Provide appropriate pastoral care;
- Research potential to give to the school and collect additional details relating to employment and philanthropic activity;
- Communicate on pupil's learning progress, behaviour, attendance, pastoral support;
- Communicate on performances and all other creative and performing arts services provided by the school;
- To Process Free School Meal applications and evaluate eligibility (Parent *Date of Birth and **National Insurance Number is required to process this application).

The lawful basis on which we collect and use this information

All personal and sensitive data held by The BRIT School will be processed fairly, lawfully and in a transparent manner. We will only use the data for the purposes specified above, and for explicit and legitimate purposes.

The BRIT School will collect and hold personal and sensitive personal data for the following lawful basis:

- **Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6, Section 1.e of the General Data Protection Regulation (EU) 2016/679).**
- **Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject; (Article 9, Section 2.g of the General Data Protection Regulation (EU) 2016/679).**

School Fundraising, Wealth Screening & Donor Management

The school will, from time-to-time and for limited and specific purposes only, contact parents by post regarding fundraising and voluntary opportunities to donate to the ongoing delivery of the arts at the BRIT School. This category of communication will be limited to no more than three letters in an academic year and will be restricted to postal delivery.

We may carry out wealth screening, a process which uses trusted third-party partners to automate some of this work. We may use information gathered from the sources listed under 'exactly how we use your data and what data we hold'. See Addendum 1 – Pupil and Parent Privacy Notice – Wealth screening, on our website for further information (www.brit.croydon.sch.uk/privacy).

Where email is used to communicate regarding fundraising and donations, we will rely on consent, unless included in a newsletter informing the recipient of news and events at the school, where the allocations of donations and the opportunity to donate may be referred to.

The BRIT School will collect, hold and process personal data under the following lawful basis, with the understanding that parents would reasonably expect the school to process their data for this purpose:

- **processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (Article 6, Section 1.f of the General Data Protection Regulation (EU) 2016/679).**

You may, at any time, request that the school no longer process your data for this purpose, by contacting the Data Protection Officer (dpo-brit@brit.croydon.sch.uk).

Collecting & Storing Pupil Information

Whilst the majority of pupil 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.

We hold pupil's Educational Record in secure digital and physical storage. We will retain records up to and until the August following a pupil's 25th Birthday (Date of Birth of the pupil + 25 years + months remaining until August). For an exhaustive list of retention periods, please refer to The BRIT School Data Retention Schedule, which can be found on our website: www.brit.croydon.sch.uk/policies

System Used for Processing Pupil and Parent/Guarding Data

	PUPIL DATA	PUPIL SENSITIVE DATA	PARENT/GUARDIAN DATA
iSAMS (school management information system (MIS))	✓	✓	✓
SISRA (performance data analysis)	✓	✓	
CPOMS (child protection and safeguarding system)	✓	✓	

Microsoft office 365 (cloud based email system)	✓		
Google for education (learning management system)	✓		✓
File Director (Application form file management) – on premise hosting	✓	✓	✓
Groupcall (Communication, data and identity management)	✓		✓
Donor management - Salesforce	✓		✓
School Lockdown App (emergency lockdown and broadcast system)	✓		

HOW WE USE YOUR DATA

Pupil Information Sharing

We routinely share pupil information with the following:

- Schools that the pupil's attend after leaving us;
- Our local authority;
- The Department for Education (DFE).

For data shared outside of the EEA, please contact student services: studentservices@brit.croydon.sch.uk

Please note that it is technically possible for the hosted systems (listed above) to be accessed by employees of the school from outside the EEA. Should this be a concern, please contact the Data Protection Officer using the details at the end of this document, or by emailing dpo-brit@brit.croydon.sch.uk.

Parent Information Sharing

The table below provides a detailed overview of the information that we collect and share and the purpose for collecting that information.

We will NEVER sell your data or pass it on to 3rd parties for marketing purposes. We will only transfer data to 3rd parties who are acting as our agents with a data sharing agreement in place.

DATA PROVIDED TO/FROM THIRD-PARTIES WITHIN THE EU

HMRC	Claiming gift Aid and compliance
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DATA PROVIDED TO/FROM THIRD-PARTIES OUTSIDE THE EU

Mail Chimp	Used for emailing and communications
Non-UK tax bodies	Under legal requirements under the relevant local law where donations are provided.

PUBLIC SOURCES OF INFORMATION

LinkedIn and other social media sites	Provides personal details, contact information and business details. To maintain our obligation to keep accurate records and assist with prioritising parent engagement and fundraising activities.
Companies house	Provides details of directorships, past and current, in addition to contact details. To maintain our obligation to keep accurate records and assist with prioritising alumni engagement and fundraising activities.
Electoral Register	To confirm address details, under our obligation to maintain accurate records and assist with prioritising alumni and fundraising activities.
Search Engines E.G. Google, Yahoo, Bing	To confirm address details, under our obligation to maintain accurate records and assist with prioritising alumni and fundraising activities.

WEALTH SCREENING

Factory	Independent research agency and consultancy for the non-profit sector, providing research, due diligence and wealth screening services.
Prospecting for Gold	Provides research, wealth screening, consultancy and training support to charities of all sizes.
Wealth Engine	Research services firm for non-profit organisations and financial services companies.
News: Ft Online, Google Alerts, Factiva	To update information where relevant

Why we share pupil information

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

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information about Individual Pupils) (England) Regulations 2013.

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.

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

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 the Department for Education: <https://www.gov.uk/contact-dfe>

Retention Periods

We will only retain your personal data and sensitive personal data for as long as we are obligated to by applicable laws and DfE requirements.

The data retention periods are as follows:

Pupil Educational Record (pupil file):	Date of Birth of the pupil + 25 years
Examination Results:	Held on pupil file - Date of Birth of the pupil + 25 years
Child Protection Information:	Held on pupil file - Date of Birth of the pupil + 25 years
Attendance Registers:	Preserved for a period of 3 years after the date on which the entry was made Relating to authorised absence – current academic year + 2 years
Special Educational Needs:	Held on pupil file - Date of Birth of the pupil + 25 years
Implementation of Curriculum:	Schemes of work, timetables, class record, mark books, record of homework – Current year + 1 year
Pupils' Work:	Where possible, pupils' work will be returned to them at the end of the academic year. In some circumstances, we may retain pupils' work for no longer than current year + 1 year

For further information regarding the school's retention period please see 'The BRIT School Records Management Policy' in the Data Protection section of our website (www.brit.croydon.sch.uk/dataprotection).

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 educational record (children aged 13+), or the information we hold on you as a parent/guardian, please complete the 'Subject Access Request' form in the Data Protection section of our website (www.brit.croydon.sch.uk/dataprotection). Alternatively, contact Student Services studentservices@brit.croydon.sch.uk.

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

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, by contacting the Data Protection Officer (dpo-brit@brit.croydon.sch.uk).

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact:

Data Protection Officer

Craig Stilwell
Judicium Consulting Limited
72 Cannon Street
London
EC4N 6AE

Tel: 020 326 9174

Email: dataservices@judicium.com

Student Services

Vanessa Crudgington
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Fundraising & Donor Management

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Email: development@brit.croydon.sch.uk

Appendix:

1. The Data Protection Act 2018 - <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
2. The General Data Protection Regulation - <https://gdpr.eu/>
3. Addendum 1 – Pupil and Parent Privacy Notice – Wealth Screening – <https://brit.croydon.sch.uk/privacy/>
4. The Information Commissioner's Office (ICO) concerns - <https://ico.org.uk/concerns/>