Privacy Notice - Data Protection Act 2018

PARENTS – October 2026 Issue

Under Data Protection Law, individuals have a right to be informed about how the School uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about our **students**. It is issued in hard copy upon first admission to the school. Thereafter, updates are posted on the school website.

Vyners School is part of Vanguard Learning Trust, which is a registered 'data controller' for the purposes of Data Protection law. The Trust has a central Data Protection Policy, a copy of which can be obtained from the Trust website (www.vlt.org.uk)

Each School within the Trust has appointed a Data Protection Lead (DPL) who is your first point of contact for any queries or subject access requests.

The DPL for Vyners School is – Miss Karen Williams

The Trust is also required to appoint a **Data Protection Officer.** Your DPO is:

Miss Karen Williams, Business Manager, kwilliams@vynersschool.org.uk, 01895 234342

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

- Student, parent and emergency contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests, including progress checks
- Curriculum records, such as options choices.
- Characteristics, such as ethnic background, religion, eligibility for free school meals, or special educational needs
- Exclusion / behaviour information
- Details of any medical conditions, including physical and mental health.
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs and video footage
- CCTV images captured in school

We may also hold data about students that we have received from other organisations, including previous schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care and protect student welfare
- To keep individuals within our school community as safe as possible
- Facilitate student participation in extra-curricular and enrichment activities
- Assess the quality of our services
- Administer admissions waiting lists
- Comply with the law regarding data sharing

Our legal basis for using this data

We only collect and use students' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest (i.e. it is needed to facilitate the effective education of your child)

Less commonly, we may also process students' personal data in situations where:

- We have obtained consent to use it in a certain way. We may seek that consent in writing, electronically or verbally and, in some instances, we will seek joint consent from yourself and your child
- We need to protect the individual's vital interests (or someone else's interests). **Parents are advised that CCTV footage may be used as evidence as part of an investigation into poor student behaviour.**

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Where you have provided us with consent to use your data, you may withdraw this consent at any time by contacting your DPL in writing (or by email).

Collecting this information

While the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible implications of not complying.

Right to withdraw consent

Where we have got permission to use your data, this consent may be withdrawn at any time by contacting Miss Williams.

Parents are advised that, under the legislation, students have a legal right to control their own personal data once they are old enough to understand their rights. This is usually around age 14 years, but will vary from person to person.

The school is conscious of the need to balance the rights of students, with the necessity to ensure that parents remain informed about their child's wellbeing and educational progress. Students continue to be legal minors (regardless of these rights), and the school will not allow students to use the Data Protection Act to withhold information which it is reasonable (or indeed legally necessary) for a parent to receive.

How we store this data

We keep personal information about students while they are attending our school. In order to continue to comply with our legal obligations, we will retain some of the information once your child has left. Information will be destroyed in accordance with the Information and Records Management Society's Record Retention Guidelines (a copy of which is available on the Trust website and may be requested from the Business Manager).

Data sharing

We do not share information about students with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about students with:

- The **London Borough of Hillingdon** – to meet our legal obligations to share certain information with it, such as safeguarding concerns, school admissions, student exclusions and student destination data at the end of Year 11 and 13.
- The **Department for Education** and **Ofsted** - to meet our legal obligations to share certain information with it in relation to student progress and to facilitate the statutory inspection of state schools.
- Those with parental responsibility for the student and any other nominated family representatives.
- **Vaccinations UK** and the **NHS** in order that the national vaccination programme for school age children is delivered effectively
- **Arbor** - our management information system. The school uses its texting service to either communicate whole school emergency messages (e.g. about school closures or lockdowns) or individual / small group messages
- Other educational providers or third-party organisations - to facilitate the provision of extracurricular activities and cross-school activities. This is particularly the case for students studying post-16 across more than one school.
- Other schools within Vanguard Learning Trust, where data sharing enables us to support extra-curricular activities or the provision of educational provision.
- **Examining bodies** – in order to facilitate the entry of our students into public exams.

- Suppliers and service providers – particularly **ParentPay, Biostore/IRIS** and **Arbor** to enable them to provide the service we have contracted them for, such as the provision of our cashless catering and management information system. **London Grid for Learning (LGFL)** supplies our free school meal eligibility checker.
- **School Cloud** - our external support provider for remote Parents' Evenings
- **Applicaa Ltd**, who supply the online portal we use to collect data about students joining the school (Admissions+)
- **EduFOCUS Ltd**, who supply the online portal we use to organise school trips and visits (Evolve)
- **PracticePal** who provide the electronic platform which enables us to timetable (and mark student attendance at) peripatetic music lessons.
- **Place 2 Be,** which provides mental health support to students.
- **PupilProgress.com,** which enables the school to benchmark year 11 attainment data in maths and English against the national cohort.
- Our Payroll Bureau (**Juniper Education**) and **HMRC** – to facilitate payments to students who undertake paid work for us
- The **Health and Safety Executive** – to comply with our statutory obligation in relation to accident and RIDDOR reporting
- Security organisations – in particular **EST** who service our CCTV system
- The emergency services (Police, Fire, Ambulance), where information needs to be shared for safeguarding reasons, for the purposes of crime prevention or to provide assistance to a student in an emergency.

From time to time, we will recommend online tools and apps in order to support your learning. These include, but are not limited to: Unifrog, Tassomai, Dr Frost Maths, Pixl apps, Kerboodle, Sparx Learning, Times Tables Rockstars Maths, Adobe Creative Cloud (for photography and media students), Bedrock Learning, Seneca Learning, Collins Connect, Educake, ExamPro, Oliver, Oxplore and Eventbrite. In order to create an account for you, we may need to share your child's full name, tutorial group and school email address. We will seek your consent before sharing any further information.

The School uses G Suite for Education (from Google) to support the delivery of education. Students will be routinely issued with a Google email account, access to Google Calendar, restricted access to YouTube and access to Google Classroom. The Privacy Notices for this suite of products can be separately accessed via the following link:
https://workspace.google.com/terms/education_privacy/?hl=en-GB

The School will also routinely put information into the public domain in order to congratulate students on their individual achievements and to demonstrate the high standards of education being delivered at Vyners School. Such information may include photos included in the school prospectus and other marketing information, pictures of learning taking place around the school, references on the schools Facebook / twitter accounts, information supplied via regular school newsletters, names in concert programmes etc. The School will, in all cases, remain conscious of its safeguarding responsibilities and will not share any personal information which will put a child at risk.

Photographs / film footage of students

The School will routinely take and retain a photo of every student in the school. This will be stored securely on our management information system (**Arbor**) and made available internally to staff to facilitate the delivery of education.

The photos are taken and supplied by the School's external photographer – currently **Tempest Photography**.

In order to facilitate the external assessment of students in some subjects (particularly drama and performing arts), the school is required to take film footage of assessed performance, and to supply this to exam boards for moderation.

The School respects the right of parents, and students to object to photographs being used to promote the school. All parents will be asked to specifically let us know whether they are happy for photos of their child to be used for publicity / marketing purposes, as part of the admissions process for joining the school.

Separate, and specific, consent is sought about including all students in the whole school photo – an important Vyners tradition that has been in place since the school opened in 1959.

Under the Data Protection Act 2018, students over the age of 13 have the right to consent in their own right to the processing of their data, including photographs. A separate privacy notice has been prepared for students.

Whilst students over the age of 13 have the right to consent to their photos being taken and used, the School respects that some parents feel strongly on this issue. Where parents and students take a different view on whether photographs can be taken and used to promote the school, the presumption will be in favour of photos not being taken or used. In such a situation, parents and students will be asked to discuss the issue at home.

Where photographs are being taken in school, particularly for future marketing, students will always be given the verbal opportunity, on the day, to not be in a photo.

Google Meet

The school's preferred video meeting platform is Google Meet

Whilst the school no longer records live lessons, the use of Google meet is still occasionally used for conducting remote meetings and events with students. The Schools usual standards of behaviour operate in Google Meet sessions and rewards and consequences may be given remotely.

All Google Meets will either be supervised in school or will be subject to unannounced drop-ins from a member of the Senior Leadership Team.

Students, staff and parents are explicitly prohibited from recording, photographing or taking a screenshot of any Google Meet session. Staff or students found to be doing so may be subject to behaviour or disciplinary sanctions.

Biometric information

The School collects and holds biometric information on students in connection with its cashless catering system. For students in Years 7-11, specific consent is sought from parents to hold this information when a child is admitted to the school. For 6th Form students, joint consent is sought from parents and students during 6th form enrolment. In all cases, if parents or students prefer that

the school does not hold this information, we can supply an alternative method of identifying students. Please let Miss Williams or one of the ICT technicians know.

National Pupil Database

We are required to provide information about students to the Department for Education as part of statutory data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research. The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards. The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data. You can also contact the Department for Education with any further questions about the NPD.

Youth support services

Once our students reach the age of 13, we are legally required to pass on certain information about them to the London Borough of Hillingdon, as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers can contact the DPL to request that we only pass the individual's name, address and date of birth to the London Borough of Hillingdon in connection with these services. This right passes to the child once they reach the age of 16 years.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with Data Protection Law.

Parents and students' rights regarding personal data

Individuals have a right to make a **'subject access request'** to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 13), or where the child has provided consent. Where parents wish to make a request for a child over the age of 13 years, the School will routinely ask for evidence of the child's consent to provide this data.

The Trust reserves the right to ask an individual making a subject access request to verify their identity before such a request is actioned. This may invoice a request to provide photographic ID, proof of address or proof of relationship to the data subject. Proof of identity is not a mandatory

requirement and the school will take a pragmatic approach in deciding whether such evidence is reasonably necessary.

The School has prepared a Privacy Notice for students, making them aware of their data protection rights. This document is downloadable from the School website.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them personally.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact the DPL.

Parents in maintained schools are entitled to a copy of their child's educational records under the Education (Pupil Information) (England) Regulations 2005. This provision does not apply to academy schools. Vanguard Learning Trust however considers it is in the best interest of students to ensure that parents are well informed about the educational experience and progress of their child. Information will therefore be provided to parents, or those with parental responsibility, on a voluntary basis, so long as such disclosure does not otherwise conflict with the provisions of the DPA 2018, including the subject access rights of the student themselves.

Sharing information to safeguard children

From 30th September 2026, schools have a legal duty (section 16LA of the Children Act 2004) to share relevant information where this may help another organisation or professional to safeguard a child or promote their welfare. This means that, where the duty applies, the school does not need to ask for parental consent before sharing information. The school will only share information that is relevant and proportionate, and the school will continue to handle personal information securely and in accordance with data protection law.

As an example, a school may need to share information with children's social care, health services, the police or another relevant organisation about concerns a child has shared, patterns of absence or changes in behaviour that may indicate a welfare concern, or relevant information about a child's or family's circumstances. The school may also be required to provide relevant information when another safeguarding organisation asks for it.

Where it is safe and appropriate to do so, the school will be open with children and families about what information is being shared, with whom and why. However, the school is not obliged to seek consent where the law requires them to share information, and there may be occasions when it would not be appropriate to tell a family before information is shared because doing so could increase the risk to a child.

Other rights

Under Data Protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact the DPL.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact our Data Protection Officer (Miss Karen Williams).

If you are unsatisfied after speaking to our data protection officer, you may raise an official complaint via the Vanguard Learning Trust Complaints Policy (available on the Trust website – www.vlt.org.uk).

If you remain dissatisfied after the complaints process is concluded, you can also make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113 ● Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

This notice is based on the Department for Education's model privacy notice for students, amended for staff and to reflect the way we use data in this school.

All parents are asked to complete the following as part of their child joining Vyners School. Consents are secured electronically via the Admissions+ platform

Consent to use student photographs for wider marketing / promotional purposes

I have read the information above regarding how my child's photograph will routinely be used. I understand that the school wishes to use photographs and video to support the learning of others, and to promote the school more widely. I understand that I have a right to object to such use, on behalf of my child.

I agree to give my permission for:

- photos of my child to be used for wider school publicity purposes ..... (tick here only if you agree)

- My child to be included in the whole school photo ……(tick here only if you agree)

- videos of my child to be used for school publicity purposes ..... (tick here only if you agree)

- videos of my child to be used to support the learning of others …… (tick here only if you agree)

I understand that, once my child is aged over 13, they may exercise their data protection rights independently. Should my wishes, and those of my child, come into conflict, I understand that the School will ask us to discuss this issue at home, so that agreement may be sought within our family as to whether consent is given.