

# TGGS Privacy Notice

## What data we collect and what we do with it.

### The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, Pupil Premium information and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as previous attainment; Key Assessment results; End of Year internal and external examination results; post 16 courses enrolled for and any relevant results)
- behavioural information (such as detention registers, exclusions and any relevant alternative provision put in place)
- Pastoral support (such as issues surrounding students; mentoring notes; next steps)
- Educational visits (such as passport information, EHIC numbers, medical needs, mobile phone numbers). All trip data is destroyed upon the return of a successful trip.
- Data collected automatically from Wi-Fi and Internet usage. This is not shared.

If you have opted-in we also process the following information. Please remember that you are free to opt-out or amend your options by contacting [dataoffice@tggsacademy.org](mailto:dataoffice@tggsacademy.org)

- Photos
- Biometrics – finger-prints that are held as unique numerical codes not copies of your daughter's finger-prints.
- Contact information for marketing purposes
- Potential students: as part of our out-reach programs we may hold basic information on you to ensure that you are safe during any time that you spend with us at TGGS

## Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- a) to support and celebrate pupil learning, including external examinations
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care including attendance
- d) to assess the quality of our services so that, as a school we can constantly strive to provide an excellent education
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us for DfE data collections
- g) to meet the statutory duties placed upon us to keep our students safe
- h) to administer medical care where needed
- i) to run safe educational visits
- j) to market/showcase the school or pupils' work/achievements
- k) to run our school-meal system

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are:

| Data collected/processed   | Lawful base  |
|--|--|
| <ul style="list-style-type: none"> <li>• to market/showcase the school or pupils' work/achievements;</li> <li>• to run our school-meal system.</li> </ul>  | 6(1)(a) – Consent of the data subject  |
| <ul style="list-style-type: none"> <li>• Initial data collected through the 11+ process.</li> </ul>  | 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract                                  |
| <ul style="list-style-type: none"> <li>• to meet the statutory duties placed upon us for DfE data collections;</li> <li>• to meet the statutory duties placed upon us to keep our students safe;</li> <li>• SEND data collection including access arrangements.</li> </ul>                     | 6(1)(c) – Processing is necessary for compliance with a legal obligation   |
| <ul style="list-style-type: none"> <li>• to provide appropriate pastoral care including attendance;</li> <li>• to administer medical care where needed;</li> <li>• to run safe educational visits;</li> <li>• to keep children safe (food allergies, or emergency contact details).</li> </ul> | 6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person   |
| <ul style="list-style-type: none"> <li>• to support and celebrate pupil learning;</li> <li>• to monitor and report on pupil attainment progress;</li> <li>• to assess the quality of our services.</li> </ul>  | 6(1)(e) – 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 |

We also collect and process the following personal data that is considered sensitive:

| <b>Data collected/processed</b> | <b>Lawful base</b>   |
|---------------------------------|--|
| Ethnic /racial origin           | 9 (2) (d) ...in the course of our legitimate activities (currently requested and safeguarded by DfE) |
| Health data                     | 9 (2) (h)...the provision of health or social care.  |

## How we collect pupil information

We collect pupil information via:

- a) Online New Student Form;
- b) Common Transfer Files from previous schools;
- c) Correspondence with parents/carers;
- d) SEND information from previous schools including TAPs forms. These are given to us by secure transfer.
- e) External bodies in the case of safeguarding information.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

## How we store pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe and how we destroy it when appropriate, please visit [https://www.tggsacademy.org/tggs\\_policies](https://www.tggsacademy.org/tggs_policies).

## Who we share pupil information with

We routinely share pupil information with:

- Paul Nelson of PKN solutions Limited for the 11+
- Students' parents/carers;
- schools that the pupils attend after leaving us;
- our local authority;
- youth support services (pupils aged 13+) (Careers South West);
- the Department for Education (DfE);
- For students who are taking post 14 qualifications such as GCSEs or A Levels, the Learning Records Service will give us your unique learner number (ULN) and may also give us details about your learning or qualifications. The Learning Records Service collect data on behalf of the Education and Skills Funding Agency for the Government.
- examination boards (to enter pupils for external examinations);
- JCQ for external examinations;
- UCAS (to support our students' applications to universities);
- Education visit companies/work placement companies as/when your daughter signs up to these;

- Microsoft, SIMs and other ICT providers which are all GDPR compliant;
- School nursing team;
- School counsellor;
- Children's/Social services/CAHMS/NHS/Police for safeguarding;
- ALPs, which is an organisation that uses prior attainment to help us identify strength and weaknesses and support you throughout your time at TGGs (<https://alps-va.co.uk/about>);
- Torquay Boys' Grammar School – uniquely for any TGGs who do A-Levels at the boy's school. This is to enable your progress to be tracked and monitored and to ensure that you are safe and supported should you be studying there.

**Please be assured that the amount of information shared is always the minimum that enables us to support your daughter fully.**

## Why we regularly 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. Please see our Data Protection Policy and our GDPR-compliant record management policy - [https://www.tggsacademy.org/tggs\\_policies](https://www.tggsacademy.org/tggs_policies).

### Youth support services

#### 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

The information shared is limited to the child's name, address and date of birth. However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16. Data is securely transferred to the youth support service via encrypted transfer and is stored securely (conforming to ISO27001) and held in accordance with our data retention schedule.

#### 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

Data is securely transferred to the youth support service via encrypted transfer and is stored securely (conforming to ISO27001) and held in accordance with our data retention schedule.

For more information about services for young people, please visit our local authority website.

## Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

## 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 child's educational record, contact the Data Protection Officer on [dataoffice@tggsacademy.org](mailto:dataoffice@tggsacademy.org)

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 (sales) – TGGs does not provide data to third parties for marketing purposes.
- object to decisions being taken by automated means (a computer making decisions about you based on data without a human being involved) – TGGs does not do this.
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed – TGGs will be moving to Parent Lite which will allow you to alter much of the data that we hold on you as and when you need. For other rectifications please e-mail the data office.
- a right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance [dataoffice@tggsacademy.org](mailto:dataoffice@tggsacademy.org) or directly to 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:**

N. Twelves – Data Protection Officer  
Torquay Girls' Grammar School  
[dataoffice@tggsacademy.org](mailto:dataoffice@tggsacademy.org)  
01803 613215

## How Government uses your data

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

## Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

## The National Pupil Database (NPD)

Much of the data about pupils in England is held in 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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

## Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfE-external-data-shares>

To contact DfE: <https://www.gov.uk/contact-dfe>