## **Fair Processing Notice**

# The Headteacher in the name of St Thomas' C E School as Data controller

The Headteacher, in the name of St Thomas C E School, is a data controller for the purposes of the Data Protection Act 2002/General Data Protection Regulation (Isle of Man) Order 2018.

The contact details for the Data Controller are St Thomas' C E School, Finch Road, Douglas, Isle of Man IM1 2PL.

In addition to the information set out in the Isle of Man Privacy Notice, we may also collect the following information about your child as required by the Education Act 2001 and the Registration of Pupils Regulations 2016:

1. Full legal name and where known, any former name or names;

- 2. Gender;
- 3. Date of birth;
- 4. Unique pupil number;
- 5. Ethnic group and by whom that information was provided;
- 6. First language;
- 7. Date of admission to the school;
- 8. Year group;
- 9. The address and postcode of the pupil's usual residence and any other properties at which the pupil is also known to reside on occasion;
- 10. The name and address of every person known to the school to be a parent of the pupil and at least one emergency contact telephone number;
- 11. The name and address of any other schools the pupil is known to have attended, if any, and in the case of guest registration, any other schools at which the pupil is registered;
- 12. Full-time or part-time;
- 13. Day pupil or boarder;
- 14. Date of leaving the school;
- 15. Usual mode of transport to and from school;
- 16. For any pupil who is known to the head teacher to be or to have been looked after by an appropriate organisation, the name of that organisation;
- 17. (where applicable) that the pupil has been found eligible for free school meals;
- 18. Attendance;
- 19. Medical information for the vital interests of children where appropriate;
- 20. Educational psychologists reports and supporting documents;
- 21. Academic achievements;
- 22. Skills and abilities;
- 23. Educational progress;
- 24. Special educational needs information;
- 25. Suspension information;
- 26. Course information;

#### How we will use the information we collect about you

St Thomas' C E School may use your information to:

- register your child at the school;
- record attendance information;
- produce an educational record containing:

The Data Protection Officer for the Department of Education, Sport and Culture is: Andrew Shipley, Department of Education, Sport and Culture, Hamilton House, Douglas. IM1 5EZ. Tel 01624 685828. Email: <u>DPO-DESC@gov.im</u>.

- o Information about your child
- Personal education plans
- Educational psychologist's reports and accompanying documents
- produce a curricular record containing: 
  o Academic achievements;
- Skills and abilities; and
- Educational progress

• produce a record of special educational needs and special needs provision, if appropriate detailing:

- The type of special need;
- A ranking of the special needs if there is more than one;
- $\circ~$  The special needs provision being made; and
- $\circ$  Whether teaching is in a special education needs unit or elsewhere
  - record details of suspensions
  - produce a record of the studies undertaken;
  - help prevent and detect crime

St Thomas; C E School has a statutory obligation to check and verify the data you provide to us on registration documents and on consent forms. This may include checks of publicly available information but in some cases, where it is necessary and relevant, the information you provide may be disclosed or shared with other organisations.

### How we will share the information we collect about you

Third parties we may share your data with include, for example:

- Department of Education, Sport and Culture
- Department of Health and Social Care
- Arbor
- CAMHS
- Boxall
- ClassDojo
- Kahoot
- Lucid
- Mymaths
- Nessy
- Sumdog
- Junior librarian
- Google
- Media eg IOM newspapers for achievements
- law enforcement agencies
- fraud prevention agencies

App / Service	Data shared	Server location	Basis for sharing	Retention period
			information	
DESC	Attendance	IOM	Carried out in	As needed if
	information		the public	attendance falls
			interest /	below 80%
			exercise of	
			official authority	
			vested in the	
			controller	
DESC	Exam / Level	IOM	Carried out in	Public record of
	information –		the public	aggregated results
	pseudonymised so		interest /	
	no person identified		exercise of	
	by DESC		official authority	
			vested in the	
			controller	
DHSC	Dental survey	IOM	Consent	August after the
				information
				supplied
DHSC -	Name, DOB, contact	IOM	Consent	August after
Community	details, attendance			reaching 16 years
nurses	data.			old
DHSC - CAMHS	Nama DOR contact	ТОМ	Consent	DOB + 25 years
	Name, DOB, contact details, attendance			DOD + 25 years
	data			
DHSC – Child	Name, DOB, contact	IOM	Vital interests of	Deleted one year
	details, attendance			after coming off
	data, pupil record,			child protection.
	incident and			
	accident reports,			
	communications			
	between school and			
	parent.			

Arbor	Full pupil record	11	Legal basis –	
	containing data	EEA	Education Act	DOB + 25 years
	indicated in		2001 and	
	legislation.		Registration of	
			Pupils	
			Regulations	
			2016.	
ClassDojo	п п	Outside EEA	Separate	In August after
	Year group; name	- US	Consent after	leaving school
			25.5.18	
Kahoot • • •	Name		Separate	In August after
	Email address Date		Consent after	leaving school
	of birth	Outside EEA - US	25.5.18	
Google Suite	Name, DOB	Outside EEA - US	Separate	In August after leaving school
			Consent after	
			25.5.18	
MS Teams	Name, DOB	Outside EEA - US	Separate	In August after leaving school
			Consent after	
			25.5.18	
Sumdog	Name, DOB	Outside EEA - US	Separate	In August after leaving school
			Consent after	
			25.5.18	

Information obtained or disclosed by third parties will not be used for any other purpose other than supporting the delivery of teaching and learning.

Failure to provide information may impact on support in school, the quality of teaching and learning and in achievement in examinations.

### Protecting your information

St Thomas' C E School will:

- keep your information safe and secure in compliance;
- only use and disclose your information as detailed above, where necessary
- Retain the information for no longer than is necessary and your information will be permanently deleted once the timeframes set out below have been reached (there will need to be an authorisation process, to dispose of this in line with our Records Management Policy and retention periods as outlined below (unless there is an over- riding reason to retain this information).

#### **Transfer of Information outside the EEA**

Apps and services that are used in school may require data to be stored on servers outside of the EEA. Information sent to these will be limited and are as detailed above.

#### **More Information**

You can find out more information including:

- Looking at the Isle of Man Government Privacy Policy here: <u>https://www.gov.im/about-this-site/terms-and-conditions/privacy-policy/</u>
- Contacting our Data Protection Officer who is: Andrew Shipley, DPO. Hamilton House, Peel Road. Douglas. IM1 5EZ. Tel 685828. Email <u>DPO-DESC@gov.im</u>
- Asking to see your information or making a complaint if you feel that your information is not being handled by contacting the Headteacher as Data Controller for St Thomas' C E School.
- Making a subject access request which is a request for all of the personal data we hold about you.
- Obtaining this information in large print, braille, or in an alternative language. Your rights

You have a right to access your personal data to ensure that it is accurate, and to request that it is rectified, blocked, erased or destroyed if it is inaccurate. To make any request relating to your data held by us, please contact the Data Protection Officer for the Department of Education, Sport and Culture who is: Andrew Shipley, DPO. Hamilton House, Peel Road. Douglas. IM1 5EZ. Tel 685828. Email <u>DPO-DESC@gov.im</u>

If you are not satisfied with the response you receive, you may also complain to the Information Commissioner, whose details can be found on <u>www.inforights.im</u>, or the relevant supervisory authority. You may have a right to other remedies.

Document Type	Retention Periods
	[Time period with confirmation of date this time period runs from/to]
Pupil record (unless	DOB + 25 years
there are particular	
circumstances such as	
legal action requiring a	
different retention	
period)	
Staff administration	Termination of employment + 12 months.

### St Thomas' C E School Retention Periods

Child protection files	DOB + 25 years
(unless there are	
particular circumstances	
·	
such as legal action	
requiring a different	
retention period)	
Teaching and learning	
record	DOB + 25 years
ITSLEARNING	Date of leaving school + 12 months
Google domain	Date of leaving school + 12 months
Concernt former	
Consent forms	Until re-issued and replaced, or August after your child
	leaves school
Health Forms	Until re-issued and replaced, or August after your child
	leaves school
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