



Privacy Policy / Fair Processing Notice - How We Use Student Information

Owner:NA/WAA/KLF6AA

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May 2018	May 2019	May 2019	2	May 2020
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1) Student Information

The categories of student information that we collect, hold and share include:

- Personal information (such as name, unique student number contact details and address)
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Other categories (such as assessment information, relevant medical information, (including COVID 19 test consent and vaccination record during the pandemic) and special educational needs information, exclusions / behavioural information, post 16 learning information, student premium recipient, care status, background information)
- Images for website, newsletters, reports, marketing materials, social media platforms.

CCTV

- CCTV is operated throughout The Swan premises in the interests for public/ employee/ student safety. All Green Room College students are based in The School House and Technical Suite at The Swan and all Green Room students may at some time be involved in activities held at The Swan and their images will be processed by the CCTV. Please note CCTV is NOT installed in the School House and Technical Suite, only public spaces, and there is a monitor in Stable 1 and 2 to check the CCTV footage during provision hours while students are in the public space. CCTV data can be used to monitor students for safeguarding or behaviour issues during the provision day while in the public spaces. Access to the data is either by *the NVK (Network Video Record) which is the hub kept in the office at The Swan or via the Hik Connect App on the GRC phone which is password protected. The Head of Provision & Senior Leadership Team have the password.* The Green Room also has access to 30 days of

historical footage and further information is available in The Swan CIC Data Protection Policy and CCTV policy.

The lawful basis for CCTV in public areas is to ensure the safety of students, staff, and visitors (Article 6(1)(e), public task, and 6(1)(f) legitimate interests). CCTV recordings are retained for a maximum of 30 days unless required for safeguarding or incident investigation, in accordance with The Swan CIC Data Protection Policy

During COVID-19 testing

To enable the Covid-19 testing to be completed at The Green Room Provisions, we needed to process personal data for students taking part, including sharing of personal data where we had a legal obligation.

The Green Room Foundation is the Data Controller for the data required for processing the tests and undertaking any actions which were needed by the provisions to ensure we met our public health and safeguarding legal obligations.

2) Rights of Data Subject

The Data Subject (The Student) has the following rights:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure (some of these rights are not going to apply due to other conditions set out in the Lawful Basis Section)
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling.

The Green Room does not use automated decision-making that affects students. All decisions regarding students are made with human oversight.

3) Purpose - Why we collect and use this information

Whilst the majority of student information provided 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 students whether they are required to provide certain information to us or if they have a choice in this.

We use the student data:

- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to assess the quality of our services

- to comply with the law regarding data sharing

4) Lawful Basis

The lawful basis for processing student data is primarily to comply with legal obligations (Article 6(1)(c)) and for the performance of a public task in providing education (Article 6(1)(e)).

Consent (Article 6(1)(a)) is sought for optional processing, such as photographs for marketing, newsletters, website, and social media.

Special category data (e.g., health or SEN information) is processed under Article 9(2)(h) for healthcare and education purposes, and Article 9(2)(b) for safeguarding and employment of staff to support the student.

5) Sharing - Who we share student information with and why

We routinely share student information with HM Government agencies including:

- Local authorities -admissions, invoicing, transport, social care, annual review meetings
- The Department for Education (DfE) - OFSTED inspections, census
- Work experience placements - possible employees
- The Provision students attend after The Green Room - possible college placements, attendance reporting when dual register.
- NHS - immunisation, CAMHS, speech and language therapists
- Exam boards - exam entries, and results
- Specialist practitioners - experts on pedagogical and therapeutic care
- Other government agencies required to assist in student care - eg CYPDS, YOT, DART, FSP EWO, YISP

We do not share information about our students with anyone without consent unless the law requires us to do so.

6) Storing student data

Student data is stored in Arbor Education and our website/email/curriculum/photos are stored in our Google G Suite For Education. Both of these systems are GDPR compliant. Data that is not yet entered into either of our systems, is kept in a locked cupboard behind a locked door in the provision office.

Length of time The Green Room will hold student data - DOB of the student 3 - 40 years (Guidelines from [The information and Records Management Society](#)). Retention periods are defined in the Data Retention Schedule. Safeguarding, medical, and SEN records may be retained for longer periods to comply with statutory obligations. All data is securely destroyed or anonymised once it is no longer required. Please refer to the [data retention policy](#).

7) Requesting access to your personal data - Subject Access Request

(SAR). Under data protection legislation, parents and students have the right to request access to information about them that we hold. To make a request for personal information, or be given access to a students' educational record, contact Jane Nicholls jane@thegreenroomschool.com The Green Room will then endeavour to help students and parents/carers access their data.

8) Other Rights

Students, Parents and Carers 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; (NOTE: the right to erasure - whilst the student attends The Green Room, there may be data that we would not erase if requested if it would hamper our ability to perform our public task).
- claim compensation for damages caused by a breach of the Data Protection regulations

9) Lightspeed Filtering and Monitoring

The Green Room uses Lightspeed web content Filtering and Monitoring systems and Lightspeed Alert on all student and staff web activity when logged into Google Chrome or Microsoft Edge browsers with their @thegreenroomschool.com email address.

Lightspeed Filter system is an internet filtering solution that provides monitoring, analysis and reporting on web and drive activity for all users on managed student chromebooks and all devices which are logged in with a GR email address, whether on or off The Green Room network. The Lightspeed Admin is able to see the website history and searches for the past 90 days for all staff and students, set policies and block/unblock websites.

Lightspeed Alert is an at-risk student identification solution that monitors and analyses online activity for signs of Self-Harm, Violence, Explicit Content, Bullying Weapons and Drugs. If any student searches or uses terms or images relating to any of these categories, Lightspeed will trigger an alert which is sent to all DSLs, who look at the case and close or follow up as necessary.

The lawful basis for Lightspeed filtering and monitoring is Article 6(1)(e) – performing a public task, to ensure student safeguarding and a safe online learning environment. Data collected is accessed only by authorised staff and DSLs for safeguarding purposes and is retained securely according to the Data Retention Schedule.

10) Contact

If you would like to discuss anything in this privacy notice, please contact info@thegreenroomschool.com

To read our full Privacy Notice please visit our website www.thegreenroomschool.com/policies

This policy is approved by the CEO of The Green Room Foundation

Date: _____

CEO: _____