

**Attendance Matters Limited**  
**GDPR Privacy Statement 2018**

Attendance Matters Ltd is committed to the protection of all personal and sensitive data for which it holds responsibility.

We collect, process and hold personal information to carry out a service for schools under a statutory obligation.

We recognise that your personal information is important to you, and we take our responsibilities for ensuring that we collect and manage it proportionately, correctly and safely very seriously.

In order to process your personal information we are registered as a 'data controller' with the Information Commissioner's Office.

This Privacy Notice explains how we use and share your personal data.

The Information Commissioner's Office defines personal data as data which relate to a living person who can be identified. Personal data includes names, location data and online identifiers. Where possible we will always look to use aggregated, anonymised or pseudonymised data rather than using identifiable personal data.

**Data Protection Officer:**

Our designated officer responsible for Data Protection compliance is Liz Lowther. However, all employees will exercise a personal duty.

**Notifications:**

Our data processing activities are registered with the Information Commissioner's Office (ICO) as required as a data controller. Registration Number PZ282116X.

Breaches of personal or sensitive data will be notified to the information controller, individuals concerned and the ICO.

Any breaches will be reported in writing to the information controller detailing date when occurred, what was breached, how it was breached and any other relevant issues including action immediately the breach was identified.

A record of any personal data breaches, regardless of whether we are required to notify, will be maintained.

**Personal and Sensitive Data:**

All data within the company's control will be handled in compliance with legal requirements and access to it will not breach the rights of the person(s) to whom it relates.

**Legal Basis:**

All information held will be in respect of securing or improving a child's school attendance as required by the Education Act 1996 or in relation to child protection or safeguarding as identified in the Children's Act 1989 and subsequent amendments including the Children's Act 2004.

**Information We Collect:**

- Attendance information (such as sessions attended, number of absences and absence reasons) to support a parent in fulfilling their legal duty regarding school attendance.
- Personal information (such as name, unique pupil number, date of birth, address, parent's name, address and date of birth, sibling details)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Previous convictions (in relation to unpaid penalty notices or prosecutions under sections 444 and 4441a of the Education Act 1996).
- Safeguarding information.

**Why we use this information:**

- To support a parent in fulfilling their legal duty regarding school attendance.
- To support pupil learning.
- To monitor and report on pupil progress.
- To provide appropriate pastoral care.
- To be used as evidence to secure a prosecution under the Education Act 1996.
- Safeguarding.

**Information Source:**

The information is obtained either directly from a parent (as defined under s 576 Education Act 1996), a school or another official agency such as a Local Authority.

**Keeping Your Information Up-to-Date:**

To make sure we always have the most up-to-date information about how to contact you, we may also, from time to time, update your records to reflect any changes to your personal information.

This information may come directly from you, or it may come from a third party that we consider is legitimate and trustworthy.

We may also combine the information you provide us with information we collect from trusted third parties. These third parties include: schools, the local authority, social services and health professionals.

**Communicating Privacy Information:**

When we collect personal data we will provide details of who we are, how we intend to use the information, the lawful basis for processing the data, the data retention period and the individual's right to have access to the information.

**Information we hold:**

We hold information in the form of:

- Diary Sheets
- Letters
- Court Papers
- Penalty Notices
- Attendance certificates
- Safeguarding information

Most of these documents contain attendance information (such as sessions attended, number of absences and absence reasons) and details of one or more of the following: a child's name, UPN, date of birth, address, siblings, school attended and also parent's name and address and parent's phone number; Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);

If you believe that any information we are holding on you is incorrect or incomplete, please email as soon as possible [liz@attendancematters.org](mailto:liz@attendancematters.org) We will promptly correct any information found to be incorrect.

**Who We Share Information With:**

We do not share information about pupils with anyone without consent unless the law and our policies allow us to do so. We may disclose your personal information to third parties if we are legally obliged to. This includes exchanging information with schools, academies, local authorities or social services for the purposes of the provision of legal, health, social care or treatment.

**Information Audit:**

An audit of the information we hold was conducted on 1<sup>st</sup> May, 2018, to allow us to document what data we hold, where it came from and who we share it with.

**Fair Processing:**

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, school staff, parents and pupils prior to the processing of individual's data.

Parents will be notified of the intention to share data relating to individuals to an organisation other than the school in which the child attends or the LA.

**Subject Access Request:**

All individuals whose data is held by us have a legal right to request access to such data or information about what is held. We shall respond to such requests within 40 days and they should be made in writing to: Liz Lowther, 84 Wellington Street, Grimsby, DN32 7DZ.

A charge of £10 will be applied to process the request.

**Security:**

We are committed to ensuring that the information we hold is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we hold.

**Data Retention Period:**

All data relating to a child or family and will be retained for no longer than required.

**Data Protection Impact Assessment:**

An assessment of the information we hold was conducted on 1<sup>st</sup> May, 2018, to allow us to assess what data we hold, where it came from and the impact if the security of the information was compromised.

**Data Disposal:**

All data held in any form (paper or electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

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This information may come directly from you, or it may come from a third party that we consider is legitimate and trustworthy.

We may also combine the information you provide us with information we collect from trusted third parties. These third parties include: schools, the local authority, social services and health professionals.

**Consent:**

The information collected is used to carry out a service for schools and academies. There is a lawful reason for processing this information and therefore consent is not required.