

## **Privacy Notice for Behaviour Support Service (For pupils, parents and staff in schools and external agencies)**

### **The categories of pupil information that we collect, hold and share include:**

- On Referral - Personal information such as name of pupil, address, parental contact details/telephone numbers
- Characteristics such as attendance, exclusions, known behavioural difficulties, strategies used by school, Special Educational Needs information, any other agencies involved, family background and intended outcomes of the intervention
- Behaviour Support Plans detailing intervention to be delivered in schools to relevant stakeholders
- Contact and Intervention sheets / Database to track intervention progress
- Behaviour Support closure reports to evidence interventions carried out and next steps.
- We will accept requests for follow-up action from schools received within six months of providing the closure report, and use data for this purpose.
- Where pupils apply for Alternative Educational placements or Education Health Care Plans reports maybe shared as part of the application process with the Special Educational Needs department and Vulnerable Pupils Panel (VPP).
- Evaluation surveys with schools, parents, pupils at the end of intervention

### **Why we collect and use this information**

We use the pupil data:

- to support pupil behaviour in the educational setting
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

### **The lawful basis on which we use this information**

Schools obtain parental consent for referral and the processing of personal data in order for the BSS team to deliver a service to the pupil/parent/carer. This in effect forms a contract between all parties and the Behaviour Support Service. Our lawful basis for processing is therefore in order to undertake the performance of a contract as defined by Article 6(1)(c) of the General Data Protection Regulation (GDPR), and, where applicable, in order to protect the vital interests of the data subject as defined by Article 6(1)(d).

Some of the information we need to hold is classed as special category information – primarily ethnicity, gender and any health conditions. Our legal basis for processing this data is provided by Articles 9(2)(a) and 9(2)(c) of GDPR.

## Storing pupil data

We hold pupil data up until leaving secondary education (aged 16). The only exception is if the intervention takes places in Year 10/11 schooling the data is held until the pupil's 18<sup>th</sup> birthday. All information is held securely with physical, organisational and electronic access controls to safeguard the information both at rest and when in transit.

We routinely share pupil information with:

- Referring school (regularly)
- Parents/Carers
- Local Authority
- Together for Children
- Other agencies that maybe co-working the case. Eg Early Help workers, CAMHS, CYPS, Educational Psychology, Autism Outreach Service, Speech and Language, other medical professionals
- DFE/Ofsted

## Why we share pupil information

We do not share information about pupils with anyone without consent unless the law and our policies require or allow us to do so.

## 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 pupil's educational record, please contact the Data Protection Officer (details below)

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
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact 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:

**Behaviour Support Service Glenn Robson Director of Outreach Services  
(0191 561 4780)**

The Behaviour Support Service's Data Protection officer can be contacted via any of the following methods:

[Data.Protection@sunderland.gov.uk](mailto:Data.Protection@sunderland.gov.uk),

0191 520 5555,

or via Data Protection Officer, Strategy, Partnerships and Transformation, Civic Centre, PO Box 100, Sunderland SR2 7DN