School Privacy Notice

In order to carry out the SMART Schools+ research project, we will need to collect information about your school, staff members, and pupils, and some of this information will be personal data. Under data protection law, we have to provide you with very specific information about what we do with this data and about your rights. We have set out below the key information you need to know about how we will use personal data.

More information on how the University processes personal data can be found on the University's website on the page called 'Data Protection - How the University Uses Your Data' (https://www.birmingham.ac.uk/privacy/index.aspx).

Who is the Data Controller? The University of Birmingham, Edgbaston, Birmingham B15 2TT is the data controller for the personal data that we process in relation to your school.

What data are we processing and for what purpose will we use it? We will collect and process some personal data to conduct the research project, as explained in the School Invite Letter.

What is our legal basis for processing this data? The legal justification we have under data protection law for processing personal data is that it is necessary for our research, which is of interest to the public. The legal justification we have under data protection law for processing pupil participant special category data (i.e. information relating to pupil race, ethnic origin, health) is that it is necessary for scientific or historical research purposes or statistical purposes in the public interest.

Who will this personal data be shared with? Personal details will be kept confidential and only persons who are authorised to do so by the research team or the study sponsor will have access to this information. The sponsor may appoint a third party to access your identifiable data, but only for the purposes of monitoring how the research is conducted. We make sure we have appropriate contracts in place with them to protect and safeguard this data. If personal data are transferred outside the European Union (for example, if one of our partners is based outside the EU or we use a cloud-based app with servers based outside the EU), we make sure that appropriate safeguards are in place to ensure the confidentiality and security of personal data. The research team will consider external requests to gain access to anonymised data. When sharing data for this purpose, a Data Sharing Agreement will be required and it will not be possible to identify individuals from the data.

How will personal data be kept secure? The University takes great care to ensure that personal data are handled, stored and disposed of confidentially and securely. Our staff receive regular data protection training, and the University has put in place organisational and technical measures so that personal data are processed in accordance with the data protection principles set out in data protection law.

The University has an Information Security Management System based on ISO27001 with a range of controls covering the protection of personal information. Annual security awareness training is mandatory for staff and the University is accredited under the NHS Information Governance Toolkit, the Payment Card Industry Data Security Standard and is in the process of gaining Cyber Essentials Plus for defined services.

In relation to this project, data will be held on password protected computers in secure University of Birmingham buildings. Any paperwork containing personal data will be kept in a locked filing cabinet.

How long will personal data be kept? Your school's data and the data of participating staff, pupils and parents will be retained for 10 years. If you want to withdraw your school from the study, you can do this up to 4 weeks of the last point of data collection and all data will be deleted.

Rights in relation to this data
You may have the following rights in respect of personal data:

- The right to access to your data (often referred to as a Subject Access Request).
- The right to correct mistakes in your data.
- The right to erasure of your data (in certain circumstances).
- The right to restrict processing of your data (in certain circumstances).
- The right to complain/disagree about the processing of your data (in certain circumstances).
- The right to ask for your personal data to be transferred electronically to a third party.

However, your rights to access, change or move your information are limited, as we need to manage your information in specific ways in order for the research to be reliable and accurate.

If you would like more information on these rights, would like to exercise any right or have any queries relating to our processing of personal data, please contact:

> The Information Compliance Manager, Legal Services, The University of Birmingham, Edgbaston, Birmingham B15 2TT
>
> Email: dataprotection@contacts.bham.ac.uk Telephone: +44 (0)121 414 3916

If you wish to make a complaint about how your school's or staff's data is being or has been processed, please contact our Data Protection Officer.

> Nicola Cárdenas Blanco, The Data Protection Officer/Director of Legal Services, Legal Services, The University of Birmingham, Edgbaston, Birmingham B15 2TT
>
> Email: dataprotection@contacts.bham.ac.uk Telephone: +44 (0)121 414 3916

You also have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint using the ICO's website.