



DATA PROTECTION PRIVACY NOTICE TO PUPILS

Title	DATA PROTECTION PRIVACY NOTICE TO PUPILS
Version	1.3, May 2018
Created	Governance Committee/DPO
Validity	Pupils of DSL
Next review date	May 2019 or sooner if required

1. General Statement of the School's Duties

You have a legal right to be informed about how the school uses any personal information that it holds about you. To comply with this, this "privacy notice" is provided to you to explain how the school collects, stores and uses personal data about you.

The German School London is called the "data controller" for the purposes of data protection law.

The school's data protection officer is Matthias Krauss.

2. Personal Data the School Holds

The school holds some personal information about you to make sure it can teach you, to look after you at the school, and to provide others, such as prospective pupils and parents, with a picture of school life. For the same reasons, it receives information from some others, including schools, the local council and the government.

This personal information includes (but is not limited to)

- names and addresses, dates of birth, bank details, academic, disciplinary, admissions and attendance records, references, examination scripts and marks and staff development reviews as well as the student file
- Accident/incident reports
- Exclusion information
- Attendance information



- Safeguarding information
- Details of any support received, and support providers
- Photographs, videos and other media
- CCTV images captured in school
- Responses to surveys and questionnaires conducted by the school
- Data about pupils that the school has received from other organisations, including other schools, local authorities and the Department for Education.

3. Why the School Uses the Data

The school uses the information (data) it holds about you to help run the school. We may collect and process your personal data to get in touch with you and your parents when we need to, to check how you're doing in exams and work and whether you or your teachers need any help, to track how well the school is performing, to look after your wellbeing, to look after school property and library services, to administer its bus and cafeteria services, to keep the school's accounts and records up to date, to comply with the law regarding the sharing of your data with others, for the organisation of alumni associations and events, for marketing and fundraising purposes, and to support and manage our staff.

As you may have seen from the school's notices around the grounds, it also uses CCTV to keep the school and its property safe, and to maintain the security of the school, and for preventing and investigating crime. This list is not exhaustive and may we may need to amend it from time to time. We may also receive data directly from you, for example when you or your parents write to the school by letter or email. As you know, we also keep records such as the School's Accident and Attendance records.

4. Processing of Personal Data

The School will only process your personal data for the specific purposes set out above or for any other purposes specifically permitted by law. You will be notified when the school collects the data or as soon as possible thereafter.

While in most cases you, or your parents/carers must provide the personal information that we collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it is optional and give you or your parents/carers the chance to object. If you must provide the data, we will explain why and what might happen if you don't.

5. Sensitive Personal Data

The School may, from time to time, process sensitive personal data regarding you, your parents or guardian. Sensitive personal data includes medical information (including physical and mental health), fingerprints, and data relating to religion, race, sexuality, political opinions, or criminal records and proceedings.

- Characteristics, such as ethnic background, eligibility to bursaries or special educational needs
- Details of any medical conditions, including physical and mental health Fingerprint data



6. The School's legal basis for using this data

The school collects and uses your data when the law allows it to.

- We need to comply with the law
- We need to do so in order to provide the educational and pastoral services we have contracted to provide
- We use it to carry out a task in the public interest, or in the legitimate interest of the school, and the use is necessary and proportionate with your right to privacy.
- We have obtained your consent
- We need to do so to protect your interests, or someone else's interest.

The legal basis we would usually rely on to process sensitive personal data is explicit consent. We may also process such information on the basis that it is necessary for reasons of substantial public interest or to protect the vital interest of a pupil or another person.

Where we have obtained your consent or your parents' consent to the use of your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds, which justify the use of this data.

7. How the school store this data

The school keeps personal information about pupils while they are attending the school. It may also keep it beyond this time if this is necessary in order to comply with our legal obligations, or to further the legitimate interests of the school.

On request, the school can provide you with a copy of its schedule for the time your data is kept before it is securely destroyed.

8. Sharing data

The school shares your information with the following organisations.

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- The local authority;
- The Department of Education;
- Educators and examining bodies;
- Our regulator;
- Suppliers and service providers;
- Financial organisations;
- Central and local government;
- Our auditors;
- Professional advisors and consultants assisting the school in improving its services;



- Survey and research organisations;
- Health authorities;
- Health and social welfare organisations;
- Employment and recruitment organisations;
- Professional bodies;
- Admissions, application forms, assessments and records of achievements may be shared with “Achieving for Children”
- Youth support services: Once pupils reach age 13, the school is legally required to pass on certain information about them to the London Borough of Richmond, as it has legal responsibilities regarding the education or training of 13-19 year olds. This information enables it to provide youth support services, post-16 education and training services and careers advisers. Parents/carers or pupils, once aged 16 or over, can contact our data protection officer to request that he only pass the individual’s name, address and date of birth to the London Borough of Richmond.
- Examination results, internal and external are shared with the German Government via the Ständigen Konferenz der Kultusminister der Länder in der Bundesrepublik Deutschland (“KMK”).

In addition, the school shares data and photographs of its public events and of school life in circumstances where such data and/or photographs are placed on the school’s website and its social media platforms or in the school’s brochure. The school’s policy is not to include your names or individual photographs in such external publications without your consent, nor to publish photographs of our internal lessons or internal school activities without consent. The annual yearbook, which is made available to buy to the school community, contains class photographs, and their inclusion is considered in the school’s legitimate interests. As regards to photographs of public school events, we may not, however, always be able to ensure that each and every person appearing on those photographs has consented to the photograph being published. The school will, however, try to ensure that such publications respect your privacy.

The School also intends to disclose such data as is necessary to third parties for the following purposes:

- To give a confidential reference relating to you to an educational institution, which it is proposed you, will attend.
- To give information relating to outstanding fees or payment history to any educational institution which it is proposed that you may attend.
- To publish the results of public examinations or other achievements of pupils of the School.
- To disclose details of a pupil’s medical condition where it is in your interests to do so, for example for medical advice, insurance purposes or to organisers of school trips.

Where the School receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure. Whenever possible, your parents/ you will also be notified prior to disclosing any information about you to third parties.



9. Rights of Access

You have a right of access to information held by the School, and how we use it, by making a “subject access request”, as long as we judge that you can properly understand your rights and what they mean. If you wish to access personal data, which the School holds on them should put their request in writing to the Data Protection Officer. We will:

- Give you a description of it;
- Tell you why we are holding and using it, and how long we will keep it for;
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make automated decisions

In responding to any data subject access requests, certain information is exempt from the right of access. This may include information, which identifies other individuals, information, which the School reasonably believes is likely to cause damage or distress, or information, which is subject to legal professional privilege. The School is also not required to disclose any pupil examination scripts.

Further any reference given by the School for the purpose of education, training or employment, or prospective education, training or employment of any pupil is confidential and therefore the School may withhold disclosure in response to any data subject access request. The School acknowledges that an individual may have the right of access to a reference relating to them received by the School. However, such a reference will only be disclosed if such disclosure will not identify the source of the reference or where, notwithstanding this, the referee has given their consent or if disclosure is reasonable in all the circumstances.

Parents/carers also have a legal right to access their child’s educational record.

10. Other Rights

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don’t want it to be used if this would cause, or is causing, harm or distress;
- Stop it being used to send you marketing materials;
- Say that you don’t want it to be used to make automated decisions;
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it;
- Claim compensation if the data protection rules are broken and if this harms you in some way.

11. Parents and pupils’ rights regarding personal data:

The School will in most cases rely on your parents’ or carers’ consent to process data unless, given the nature of the processing in question, and the pupil’s maturity it is unreasonable in all the circumstances to rely on the parent’s consent. Usually, we will assume that we require your parents’ consent until you are aged 13 or over.

The school will only grant a pupil direct access to their personal data if in the School’s reasonable belief the pupil understands the nature of the request. Again, we will generally assume that this stage of maturity is reached from age 13.



Where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents or guardians, the School will maintain confidentiality unless it has reasonable grounds to believe that the pupil does not fully understand the consequences of withholding their consent, or where the School believes disclosure will be in the best interests of the pupil or other pupils.

12. Accuracy

The School will try to ensure that all personal data held in relation to you is accurate. The School will check the accuracy of any personal data when we collect it and afterwards at regular intervals. You have the right to request that inaccurate information about you is erased or corrected.

13. Security

The School will take reasonable steps to ensure that members of staff will only have access to personal data relating to pupils, their parents or guardians where it is necessary for them to do so. All staff will be made aware of this Statement and their duties under data protection law. The School will ensure that all personal information is held securely and is not accessible to unauthorised persons.

14. Enforcement

The school takes any complaints about the collection and use of personal information very seriously.

If you believe that the School has not complied with this policy or acted otherwise than in accordance with data protection law, they are asked first to contact the Data Protection Officer.

Alternatively, the individual can make a complaint to the Information Commissioner's Office.

- Report a concern online at <https://ico.org.uk/concerns>
- Call 0303 123 1113
- Write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

15. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Matthias Krauss, Commercial Director, German School Association Ltd. Douglas House, Petersham Road, Richmond TW10 7AH, UK. Matthias.krauss@dslondon.org.uk +44 (0) 208 940 2510.