



DANES HILL SCHOOL
STRONG & SAGACIOUS

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PRIVACY POLICY

(PUPILS)

How We Use Your Information Privacy Notice for Older Pupils

Independent Day School for Boys and Girls

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Introduction

This notice is to help you understand **how** and **why** we collect your personal information and **what** we do with that information. It also explains the decisions that you can make about your own information.

We are giving you this notice because you are mature enough to make decisions about your personal information.

If you have any questions about this notice please talk to [• your form tutor].

What is "personal information"?

Personal information is information that the School holds about you and which identifies you.

This includes information such as your name, date of birth and address as well as things like exam results, medical details, [• unique pupil number] and behaviour records. The School may also record your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

How and why does the School collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The School's primary reason for using your personal information is to provide you with an education.

- Admissions forms give us lots of personal information. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you.
- Sometimes we get information from your doctors and other professionals where we need this to look after you.

We collect this information to help the School run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell the appropriate teachers if you are allergic to something or have a health issue.
- We might need to tell your teachers if you have special educational needs or need extra help with some tasks.
- We may need to share information about your health and wellbeing with the [• School doctor or counsellor].
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may have information about the fact that you receive free school meals.
- We record your attendance and if you have time away from the School we record the reason(s) why.
- We may need to report some of your information to the government (e.g. the Department for Education). For example, we may need to tell the local authority that you attend the School or let them know if we have any concerns about your welfare.
- We are legally required to provide the Department for Education with certain information about you and your classmates. Some of this information will be stored on the National

Pupil Database. Organisations can request information from the National Pupil Database which might include information about you. But they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

- We may need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the School.
- If you are from another country we have to make sure that you have the right to study in the UK. We might have to provide information to UK Visas and Immigration who are part of the government.
- Depending on where you will go when you leave us we may need to provide your information to [• other schools, colleges and universities or potential employers]. For example, we may share information about your exam results and provide references. We may need to pass on information which they need to look after you.
- When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams.
- The Learning Records Service (which is part of the government) will give us your unique learning number. We may receive details about you (e.g. your qualifications) from the Learning Records Service.
- The School is sometimes inspected to make sure that we are doing everything that we should to be a good school. We may have to share your information with the inspectors to help them to carry out their job.
- If someone makes a complaint about how the School has behaved we may need to use your information to deal with this appropriately. For example, if your parents complain that we have not looked after you properly.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your classmates is injured at School or if there is a burglary.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your information with them if this is relevant to their work.
- If you have misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your academic and (where fair) your behaviour records with your parents [• or education guardian] so they can support your schooling.
- We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
- We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. [• This monitoring is sometimes carried out using computer software.] In certain circumstances we may look at the content of your communications (e.g. emails and text messages). We monitor and look at your use of technology to check that you and your classmates are not misbehaving, at risk of harm or for other good reasons. If you would like

more information about this you can read [[• the acceptable use of IT and email policy](#)] or speak to [[• your form tutor](#)].

- We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- If you have concerns about us using photographs or videos of you please speak to [[• your form tutor](#)].
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.

If you have any concerns about any of the above, please speak to [[• your form tutor](#)].

Our legal grounds for using your information

This section contains information about the legal grounds that we are relying on when handling your information as described above.

Legitimate interests

This means that the School is using your information when this is necessary for the School's legitimate interests except when this would be unfair to you. The School relies on this ground for many of the ways in which it uses your information.

Specifically, the School has a legitimate interest in:

- Providing you with an education.
- Looking after you and your classmates.
- Telling people about the School and what we do here e.g. we may use photographs of you in our prospectus, on our website or in our social media.
- Improving the School e.g. if we want to raise money to [[• build new buildings](#)] or to make sure that we are providing you and your classmates with a good schooling experience.

In addition your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to [[• your form tutor](#)].

Legal obligation

The School might need to use your information in order to comply with a legal obligation, for example, to report a concern about your wellbeing to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a task carried out in the public interest

The following are examples of when we use your information to perform tasks in the public interest:

- providing you with an education;
- safeguarding and promoting your welfare and the welfare of other children;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

If you object to us using your information when we are relying on this ground please speak to the school's Privacy Officer (Deputy Head).

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation. [• Trade union membership (e.g. if you are a member because of an apprenticeship) is also a special category of personal information.]

Substantial public interest

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above, for example the School may use special categories of information about you to provide you with an education, to look after you and your classmates or when the School is inspected.

Employment and social protection law

There may be times when the School needs to use your information because we are an employer (e.g. we employ your teachers). Also the School may use your information to comply with social protection law (e.g. to look after you) and social security laws (e.g. to provide you with free school lunches if you are entitled to these).

Vital interests:

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legal claims:

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to [• your form teacher] if you would like to withdraw any consent that you have given.

In some cases we will rely on more than one of the grounds above for a particular use of your information. For example, we may rely on legitimate interests and public interest grounds when using your information to look after you and your classmates.

Sending information to other countries

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then, it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the Privacy Officer.

For how long do we keep your information?

We keep your information for as long as we need to in order to educate and look after you. We will keep some information after you have left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

Data Retention - general policy school-wide

Pupil information (including photographic and video material)

This information is retained until the pupil turns 25.

Child protection information

The school will not retain a copy of safeguarding-related material sent to a new school unless, at the discretion of the designated safeguarding lead, there are exceptional reasons for doing so. Copies of child protection information should be kept by the final school placement until the child's date of birth plus 25 years.

Human resource/employee records

These records are kept for 6 years from the date of an employee leaving as required by law

Financial records

The limitation period for financial records is also 6 years (6 years from the end of the financial year). The school's employer liability insurance certificate is retained permanently in digital form.

CCTV/ANPR images

Images and data are retained for 28 days then deleted automatically from our servers

What decisions can you make about your information?

From May 2018 you will be able to make various decisions about your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer; and
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

[• Your form teacher] can give you more information about your data protection rights.

Further information and guidance

This notice is to explain how we look after your personal information. [• Your form teacher] can answer any questions which you might have.

Please speak to [• your form teacher] if:

- you object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

The Privacy Officer is in charge of the School's data protection compliance. You can ask [• your form teacher] to speak to the Privacy Officer. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: ico.org.uk.

How We Use Your Child's Information Privacy Notice for Younger Pupils

Independent Day School for Boys and Girls

Danes Hill School

Introduction

This notice is to help you understand **how** and **why** we collect your child's personal information and **what** we do with that information. It also explains the decisions that you can make about your child's information.

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please talk to the Privacy Officer.

What is "personal information"?

Personal information is information that the School holds about your child and which identifies your child.

This includes information such as their date of birth and address as well as things like exam results, medical details and behaviour records. The School may also record your child's religion or ethnic group. CCTV, photos and video recordings of your child are also personal information.

How and why does the School collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. Our primary reason for using your child's information is to provide your child with an education.

The admissions forms which you complete give us personal information about your child. We get information from your child, his / her teachers and other pupils. Your child's old school also gives us information about your child if we need this to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after your child.

We collect this information to help the School run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell all appropriate members of staff if your child is allergic to something or has a health issue.
- We might tell your child's teachers if he or she has special educational needs or requires extra help with some tasks.
- We may need to share information about your child's health and wellbeing with the [• School doctor or counsellor].
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may have information about the fact that your child receives free school meals.
- We record your child's attendance and if he or she has time away from the School we record the reason(s) why.
- We may need to report some of your child's information to the government (e.g. the Department for Education). For example, we may need to tell the local authority that your

child attends the School or let them know if we have any concerns about your child's welfare.

- When we are inspected by [• the Independent Schools Inspectorate / Ofsted] we may have to share your child's information with you to assist them with their inspection.
- If the School receives a complaint or grievance which involves your child we may need to use their information to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your child.
- We are legally required to provide the Department for Education with certain information about your child. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which might include information about your child. But they are only allowed to do this for limited purposes and they must be very careful about how they use your child's information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>
- We may need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other pupils at the School.
- [• If your child is from another country we have to make sure that they have the right to study in the UK. We might have to provide their information to UK Visas and Immigration.]
- Depending on where your child will go when they leave us we may need to provide their information to [• other schools and colleges]. For example, we may share information about your child's exam results and provide references. We may need to pass on information which they need to look after your child.
- If your child takes public examinations we will need to share information about them with examination boards. For example, if your child requires extra time in exams.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your child's classmates is injured at School or if there is a burglary.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your child's information with them if this is relevant to their work.
- [• If your child has misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.]
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your child's academic and (where fair) their behaviour records with you [• or their education guardian] so you can support their schooling.
- We will only share your child's information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
- We will monitor your child's use of email, the internet and mobile electronic devices e.g. iPads. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read [• the acceptable use of IT and email policy] or speak to [• your child's form teacher].

- We may use photographs or videos of your child for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- If you have any concerns about us using photographs or videos of your child please speak to [• your child's form tutor].
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.

If you have any concerns about the above, please speak to [• your form tutor].

Our legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your child's information as described above.

Legitimate interests

This means that the School is using your child's information when this is necessary for the School's legitimate interests except where the processing is unfair to your child. The School relies on legitimate interests for many of the ways in which it uses your child's information.

Specifically, the School has a legitimate interest in:

- Providing your child (and other children) with an education.
- Safeguarding and promoting your child's welfare and the welfare of other children.
- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money to [• build new buildings] and using photographs of your child in promotional material such as on our website and in the prospectus.
- Facilitating the efficient operation of the School.
- Helping the School comply with its obligations (for example, when it is inspected).

In addition your child's personal information may be processed for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another pupil.

If you object to us using your child's information where we are relying on our legitimate interests as explained above please speak to the Privacy Officer.

Legal obligation

Where the School needs to use your child's information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

In limited circumstances we may use your child's information to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

Performance of a task carried out in the public interest

The following are examples of when we use your information to perform tasks in the public interest:

- providing you with an education;
- safeguarding and promoting your welfare and the welfare of other children;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

If you object to us using your information when we are relying on this ground please speak to the Privacy Officer.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above, for example the School may use special categories of information about your child to provide them with an education, to look after your child and their classmates or when the School is inspected.

Employment and social protection law

There may be times when the School needs to use your child's information because we are an employer. Also the School may use your child's information to comply with social protection law (e.g. to look after your child) and social security laws (e.g. to provide your child with free school lunches if applicable).

Vital interests:

In limited circumstances we may use your child's information to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

Legal claims:

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your child's information in certain ways. If we ask for your consent to use your child's personal information you can take back this consent at any time. Any use of your child's information before you withdraw your consent remains valid. Please speak to [• your child's form teacher] if you would like to withdraw any consent given.

In some cases we will rely on more than one of the grounds above for a particular use of your child's information. For example, we may rely on legitimate interests and public interest grounds when using your child's information for safeguarding purposes.

Sending information to other countries

We may send your child's information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may:

- [• store your child's information on cloud computer storage based overseas]; or
- [• communicate with you about your child by email when you are overseas (for example, when you are on holiday)].

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

If the country that we are sending your child's information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the Privacy Officer.

For how long do we keep your child's information?

We keep your child's information for as long as we need to in order to educate and look after them. We will keep certain information after your child has left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your child's information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

We can keep information about your child for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

Data Retention - general policy school-wide

Pupil information (including photographic and video material)

This information is retained until the pupil turns 25.

Child protection information

The school will not retain a copy of safeguarding-related material sent to a new school unless, at the discretion of the designated safeguarding lead, there are exceptional reasons for doing so. Copies of child protection information should be kept by the final school placement until the child's date of birth plus 25 years.

Human resource/employee records

These records are kept for 6 years from the date of an employee leaving as required by law

Financial records

The limitation period for financial records is also 6 years (6 years from the end of the financial year). The school's employer liability insurance certificate is retained permanently in digital form.

CCTV/ANPR images

Images and data are retained for 28 days then deleted automatically from our servers

What decisions can you make about your child's information?

From May 2018 you will be able to make various decisions about your child's information. Some of these are new rights whilst others build on your child's existing rights. Your child's rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about your child and be provided with a copy. We will also give you extra information, such as why we use this information about your child, where it came from and what types of people we have sent it to;
- you can ask us to delete the information that we hold about your child in certain circumstances. For example, where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about your child in a format that can be read by computer;
- our use of information about your child may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

The Privacy Officer can give you more information about your child's data protection rights.

Further information and guidance

This notice is to explain how we look after your child's personal information.

Please speak to the Privacy Officer if:

- you object to us using your child's information for marketing purposes e.g. to send your child information about school events. We will stop using your child's information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about your child; or
- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office: ico.org.uk.