



DATA PROTECTION & PRIVACY NOTICE FOR PARENTS AND PUPILS

How we use your and your child's personal information

The General Data Protection Regulation (GDPR) has been put together to protect the privacy and data of EU citizens. It replaces the Data Protection Directive 95/46/EC and Aims to harmonise and broaden the reach of EU data protection law across Europe. This GDPR legislation comes into force on 25th May 2018 and will signify change for a lot of entities, specifically the way data is collected, processed and used.

Introduction & Key Facts

1. This notice is aimed at all pupils (whether prospective, current or alumni) and their parents and explains how the School uses Personal Data that is covered by European & UK data protection legislation. The School may amend this statement at any time.
2. The purpose of the legislation is to safeguard information about individuals and covers issues such as data security, an individual's rights to access their Personal Data and the use, retention and disclosure of Personal Data by others.
3. The School is a **Data Controller** under the legislation and holds **personal information** or data about pupils (whether prospective, current or alumni) and their parents. This data is held on a computer or is held in a file by reference to specific criteria concerning an individual.
4. Personal information might include information such as date of birth and contact details as well as things like exam results, financial details, medical conditions and behaviour records. The School may also record information about a child's religion or ethnic group. CCTV, photos and video recordings of your child are also personal information.
5. We collect this data to help the School run properly and safely.
6. We endeavour to keep all data up to date. If you are aware of any discrepancies please contact us so we can correct the information we hold.
7. We will use data only for purposes described in this notice and destroy it when we no longer need to retain it.
8. Sometimes we need to share data for the purposes described below.
9. When a child leaves the School data is passed to their next school.
10. As a school we have to comply with various laws and this entitles us to use your child's information where necessary.

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11. Unless this would be unfair to you or your child, we have a legitimate interest in using your child's information in order to:
 - 11.1 educate your child and others;
 - 11.2 look after your child's welfare and the welfare of others; and
 - 11.3 promote and develop the School so that it continues to be successful.
 12. If you object to us using your child's information where we are relying on our legitimate interests as explained above, or if you require any further information please speak to the School Secretary.
 13. 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. What Personal Information or Data the School holds and how it is acquired
 14. Examples of the Personal Data which the School holds about parents and pupils include:
 - 14.1 information gathered during the registration process such as contact details, financial details, previous nursery or school attendance, reasons for leaving previous establishments, national curriculum assessment results, other achievements, attendance information, educational reports and future schools;
 - 14.2 personal characteristics such as their ethnic group, any special educational needs they may have as well as relevant medical information;
 - 14.3 information received from the Local Authority, the Department for Education (DfE) or the National Health Service;
 - 14.4 other information such as photographs and voice or video recordings.
 15. The School may process sensitive Personal Data relating to parents and pupils including,
 - 15.1 information about attendance, including any exclusion information, and physical or mental health conditions in order to ensure the wellbeing of pupils and to take decisions regarding their time at school; and
 - 15.2 information about protected characteristics of pupils in accordance with the School's Equal Opportunities Policy in order to monitor compliance with equal opportunities legislation.
 16. The School may acquire Personal Data in a number of ways. For example:
 - 16.1 Parents of pupils may provide the School with Personal Data about themselves and their children, for example, during the registration process;
 - 16.2 Personal Data may be created internally by the School during the course of their time at the school by your child, other pupils or their teachers. An email from the Head to a form teacher about a particular pupil's parents would be an example of this; and

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- 16.3 Personal Data may be acquired from outside of the School community such as from other schools, public authorities and public sources such as, but not limited to, your child's doctor and other health professionals.

Why Does the School Collect Personal Information & What Do We Do With It?

17. We collect Personal Data to help the School run properly, safely and to let others know what we do here.
18. In respect of pupils and their parents, the School commonly uses Personal Data for:
- 18.1 ensuring that the School provides a safe and secure educational environment conducted outside the State system, safeguarding and promoting the welfare of all pupils;
 - 18.2 providing educational services including training and support whether educational, medical or pastoral including, for example, referrals for educational assessments or public examination entrance; 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 need to tell all appropriate members of staff if your child is allergic to something or might need extra help with some tasks. We may share your child's academic and, if necessary, their behaviour records with you or their education guardian so you can support their schooling.
 - 18.3 protecting and promoting our interests and objectives - this includes the organisation of alumni associations and events for fundraising purposes;
 - 18.4 administrative, operational and management purposes and to enable the School to meet its legal obligations as an educator. For example, to monitor pupil's performance and progress, ensuring health & safety, administering school property and library services;
 - 18.5 supporting and managing our staff; and
 - 18.6 fulfilling our contractual and other legal obligations including assessing the quality of our services.
19. We are required, by law, to pass certain information about our pupils to the Local Authority and the Department for Education (DfE) and other statutory agencies. We will not give information about our pupils to anyone without your consent unless the law and our policies allow us to do so and we consider it is reasonable and fair to do so in the given circumstances. For example, 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.
20. The School may use Personal Data for other purposes where the legislation allows and where providing an explanation would not be appropriate. For example, this includes sharing Personal Data about pupils with the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime and the

prosecution of offenders. If we hold sensitive medical information about a pupil we will obtain consent regarding which teachers should have access to that information. However, we may need to share sensitive information with staff in the absence of consent, e.g. for safeguarding or welfare issues.

Specific examples of data use

21. **Future Schools:** Depending on where your child will go when they leave us we may need to provide their information to other schools. For example, we may share information about your child's exam results and provide references. We may need to pass on additional pastoral or medical information which they need to look after your child.
22. **CCTV:** At present the School does not use CCTV, although it has a dummy camera to the front of the School to serve as a deterrent to intruders.
23. **Photographs and video recordings:** The School may use photographs and video recordings of pupils for marketing and promotion purposes including in School publications, in social media and on the School website. The School may also allow external publication of media where appropriate (for example, in a local newspaper). The School may also make recordings or ask a third party to do so, for teaching purposes, for example, recording a drama lesson to provide feedback to pupils or so that parents can watch a performance of a play or concert that they have been unable to attend. 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.
24. **Software and other technologies including social media:** The School uses software which monitors e-mails and internet browsing activities at school. For example, any e-mail sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with school policy. E-mail monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law. The School also operates some social media accounts such as Twitter and Facebook. If you send us a private or direct message via social media the message may be stored by the host site who is a third party. Any disclosure of sensitive information will be done in accordance with the legislation. Mobile phones, are only brought into school by pupils with the Head's permission, are handed in at the school office on arrival and collected by the pupil on departure.
25. **School Management & ParentMail systems:** The School, at present, does not use software supplied by external companies to manage contact information and does not share sensitive data with third party companies in order to ensure the smooth operation of these systems. If we sign up to such a system in the future, you will be informed and any disclosure of sensitive information will be done in accordance with the legislation.
26. **Overseas Transfers:** It may sometimes be necessary to transfer personal information overseas. When this is required, information may be transferred to countries or

territories around the world. Any transfers made will be in full compliance with all aspects of the relevant legislation. We may send your child's information to other countries where a child has moved abroad, usually by email; this may include academic details and reports.

27. **Biometric Data:** Currently we do not hold any biometric data, i.e. fingerprints, of children.
28. **Alumni:** We may keep details of your and your child's address when they leave so we can send them information, including for fundraising purposes, however, we never share this information with third parties for fundraising purposes.
29. **School trips:** We may share some information with our insurance company or travel company to make sure that we have the bookings and insurance cover that we need. 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 classmate is injured on a trip.

Our legal ground for using your child's information

30. As a school we have to comply with various laws and this entitles us to use your child's information where necessary. For example, we have to make sure that we take care of your child well.
31. Unless this would be unfair to you or your child, we have a legitimate interest in using your child's information in order to:
 - 31.1 educate your child and others
 - 31.2 look after your child's welfare and the welfare of others; and
 - 31.3 promote and develop the School so that it continues to be successful.
32. We also use your child's information in order to provide education, which is in the public interest.
33. We may need to use your child's information in connection with legal disputes.
34. We have a contract with you to educate and look after your child. We are allowed to use information about your child where this is necessary to comply with our contractual obligations.
35. 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. Please speak to the School Secretary if this applies.
36. We are allowed to use your child's information in an emergency, for example, if they require urgent medical attention.
37. We may use information about your child if we need this for historical, research or statistical purposes.

For how long do we keep your child's information & what do we do when we have finished with it?

38. 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 in the event of a complaint. The norm is to keep relevant information until a child is 25 years old.
39. 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, details of our leavers and their future school.
40. When a child leaves, if there is any safeguarding information it is passed on to the child's next school.
41. When we no longer require your or your child's information it is destroyed and disposed of securely, whether it is held digitally or in paper form.

Further information and guidance

42. The School Secretary is the person responsible at our School for managing how we look after personal information and deciding how it is shared. She can be contacted at info@stnicholashouse.com. Like other organisations, we need to keep your child's information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.
43. Please contact the School Secretary if:
 - 43.1 you object to us using your or your child's information where we are relying on our legitimate interests as explained above;
 - 43.2 you object to us using your child's information for marketing purposes e.g. to send your child information about school events;
 - 43.3 you would like us to update the information we hold about yourself or your child;
 - 43.4 you would prefer that certain information is kept confidential; or
 - 43.5 you have any questions relating to the above.
44. The School is registered with the Information Commissioners Office the details of which can be viewed via their website. If you consider that we have not acted properly when using your or your child's personal information you can contact the Information Commissioner's Office: ico.org.uk.

Website

45. **How we use cookies**

A cookie is a small file which is placed on your computer's hard drive and helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its

operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use some unobtrusive cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to client needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website however. You can find out more about cookies by visiting the [All About Cookies](#) resource website.

We keep our privacy notice under regular review. This privacy notice was last updated on 21st May, 2018.