

# Privacy Notice for Parents and Students

## How we use your information

2018/19



### Who are we?

Stratford upon Avon School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Stratford upon Avon School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **Z2773057**

You can contact the school as the Data Controller in writing at:  
Stratford upon Avon School, Alcester Road, Stratford upon Avon, CV37 9DH or  
staff@stratfordschool.co.uk

### What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our students and parents.

### What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

### What personal information do we process about students and parents?

The student and parent information that we collect, hold and share includes:

- Personal information including a student's name, date of birth, unique pupil number and home address.
- Characteristics such as ethnicity, language, nationality, country of birth and free school meal eligibility.
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, details of students' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's medical needs, health requirements and home life, where required as part of necessary safeguarding and welfare processes.
- Biometric information in order to provide catering, printing and library services.
- CCTV footage and photographs for health and safety, safeguarding and behaviour purposes.

### Why do we use personal information?

We use student data:

- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to provide appropriate medical care support
- to comply with the law regarding data sharing
- to safeguard students
- to provide services including catering, printing and library
- to help with career planning

## **Collecting student information**

Whilst the majority of student information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

## **What are the legal reasons for us to process your personal information?**

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons for processing personal information are as follows:

### **1) To comply with the law**

We collect and use general purpose student information in order to meet certain legal requirements and legal obligations placed upon the school by law. We are therefore required to process this personal information for such purposes even if you have not consented to us doing so e.g. educational purposes.

### **2) To protect someone's vital interests**

We are able to process personal information when there is an emergency and/or where a person's life is in danger e.g. medical, safeguarding & child protection information.

### **3) With the consent of the individual to whom that information 'belongs'**

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used e.g. biometric & photographic information.

### **4) To perform a public task**

It is a day-to-day function of the school to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that students are properly educated and supported.

The following two legal reasons do not necessarily apply to schools processing student information.

5) Contract: the processing is necessary for a contract the school has with the individual, or because they have asked the school to take specific steps before entering into a contract.

6) Legitimate interests: the processing is necessary for the school's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply to a public authority - which the school is, processing data to perform its official tasks.)

## **Special category personal information**

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject.
- 2) Processing relates to personal data which is manifestly made public by the data subject.
- 3) Necessary for establishing, exercising or defending legal claims.
- 4) Necessary for reasons of substantial public interest.
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health.
- 6) Necessary for archiving, historical research or statistical purposes in the public interest.

## **Who might we share your information with?**

We routinely share student information with:

- Schools or further education establishments that the students attend after leaving us
- WCC
- the Department for Education (DfE)
- Examination Boards

- Careers services
- External agencies
- External providers
- Police & Crown Prosecution Service
- NHS

We do not share information about our students or parents unless the law and our policies allow us to do so.

#### **Data collection requirements:**

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

#### **What do we do with your information?**

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected.

#### **How long do we keep your information for?**

In retaining personal information, the school complies with the retention schedules provided by the Information Record Management Society. <http://irms.org.uk/page/SchoolsToolkit>

You can request a copy of the school's Retention Schedule by contacting the school using the details in section one (Who are we?) of this document.

#### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

#### **What are your rights with respect of your personal information?**

Under data protection law, parents and students have the right to request access to information about them that we hold. To make a request for your personal information, contact the School Data Protection Officer at Warwickshire Legal Services via email at [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk) or alternatively;

School Data Protection Officer  
Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
Market Square  
Warwick  
CV34 4RL

**\*\*Please ensure you specify which school your request relates to.**

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, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at:

<https://ico.org.uk/concerns/>

#### **Review**

The content of this Privacy Notice will be reviewed in July 2019.