

Privacy Notice for Parents and Students 2023/24

How we use your information

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
admin@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, gender, first language, date of birth, unique pupil number, unique learner number, admission number and home address.
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, previous school information, assessment results, free school meal eligibility/pupil premium status, school reports, exclusions/behavioural information, post-16 careers information and destination data.
- Contact information for parents/carers and other relatives, including telephone numbers, home addresses, e-mail addresses and email communication between home and school.
- Information about a child's health requirements and home life, where required as part of necessary safeguarding and welfare processes.
- Details of any support received, including care plans and support providers.
- Contact information and mobile device information (for Sixth Form students).
- Catering/canteen, printing and internet activity.

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health.
- Special educational needs
- Photographs and CCTV images captured in school
- Biometric information
- Characteristics, such as ethnic background, religion, nationality.

Why do we use personal information?

We use student data:

- to support student learning and facilitate examinations
- to monitor and report on student progress
- to provide appropriate pastoral and medical care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard students and protect student welfare
- to provide services such as catering, printing and library access
- to help with career planning
- to share information with public health professionals

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 UK 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.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Previous schools
- Police force, courts, tribunals
- External support services

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.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school function e.g. CCTV.

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.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Who might we share your information with?

We routinely share student information with:

- Schools or further education establishments that students attend after leaving us
- Warwickshire County Council
- Department for Education (DfE)
- Examination Boards (Pearson Edexcel, AQA, OCR, TQUK, WJEC Eduqas)
- Information Management Software (Bromcom, ParentMail, Libresoft, Wonde, MyConcern, Fasttrak etc.)
- Careers services (Unifrog, UCAS etc.)
- External agencies (Lifespace, Safeline, Young Minds Matter)
- Education/classroom apps (e.g. Hegarty Maths, Seneca, CommonLit, Educake, DrFrost, TLC)
- Online assessment providers (e.g. TES)
- Police & Crown Prosecution Service
- NHS (incl. Compass, Rise, Compass YP Drugs and Alcohol)
- Charities e.g. Refuge
- Public Health and Public Health Agencies
- Microsoft

If you would like further information regarding who we share information with, please email

admin@stratfordschool.co.uk

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. The school monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so.

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. The schedules set out the Statutory Provisions under which the school are required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

Transferring data internationally

Where we transfer personal data to a country or territory outside of the UK, we will do so with the appropriate safeguards in place 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 admin@stratfordschool.co.uk.

In certain circumstances where the school processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school to inform them of their reasons for their objection. The school will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the school is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where the school processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact the school at admin@stratfordschool.co.uk.

You also have the right to:

- 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 annually.