

Staines Preparatory School



Privacy Notice for Pupils

September 2024

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils at our school**.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

We, Staines Preparatory School Trust, 3 Gresham Road, Staines upon Thames, TW18 2BT, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Jon Philpott (see 'Contact us' below).

2. The Personal Data We Hold

Personal data that we may collect, use, store and share (when appropriate) about your child includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents.
- Results of internal assessments and externally set tests.
- Pupil and curricular records
- Exclusion information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers.

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 and contact details for someone in case of emergency.
- Photographs and CCTV images captured in school.
- Information about characteristics, such as ethnic background or special educational needs

We may also hold data about your child that we have received from other organisations, including other schools and social services.

3. Why We Use This Data

We use the data listed above to:

- a) Support pupil learning
- b) Monitor and report on pupil progress
- c) Ensure staff are aware of allergies and medical conditions.
- d) Provide appropriate pastoral care.
- e) Protect pupil welfare.
- f) Assess the quality of our services.
- g) Administer admissions.
- h) Monitor your child's use of email, internet and mobile electronic devices.
- i) Comply with the law regarding data sharing.

3.1 Use of your child's personal data for marketing purposes

Where you have given us consent to do so, we may send your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your child's personal data in automated decision making and profiling

We do not currently process any pupils' personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our Lawful Basis for Using This Data

In relation to any processing activity we will, before the processing starts for the first time, and then regularly while it continues, review the purposes of the particular processing activity, and select the most lawful basis(or bases) for that processing, i.e. :

- That you have consented to the processing.
- That the processing is necessary for the performance of a contract to which you are party to.
- That the processing is necessary for compliance with a legal obligation with a legal obligation to which the school is subject.
- That the processing is necessary for the protection of your child's vital interests.
- That the processing is necessary for the performance of a task carried out in the public interest or exercise of official authority; or
- That the processing is necessary for the purposes of legitimate interests of the School or a third party, except where the processing is unfair to your child. The School relies on legitimate interests for most of the ways in which uses your child's information. Specifically, the School has a legitimate interest in :
 - Providing education services to your child
 - Safeguarding and promoting the welfare of your child.
 - Promoting the objects and interests of the school.
 - Facilitating the efficient operation of the school.
 - Ensuring that all relevant legal operations of the school are complied with; and
 - The legitimate interests of others e.g. another school will have a legitimate interest in requesting references regarding your child.

Where you have provided us with consent to use your child's data, you may withdraw this consent at any time.

We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your child's personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law.
- 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 the establishment, exercise or defence of legal claims.
- We need to process it for reasons of substantial public interest as defined in legislation.
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is 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.

5. Collecting This Data

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Local authorities
- Previous educational establishments
- Government departments or agencies
- Police forces, courts or tribunals

6. How We Store This Data and Keep It Secure

We keep personal information about your child while they are attending our school and for a period of seven years after they leave the school. If we have information about events that concern their safety and health, the law requires us to keep this for much longer.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

7. Who We Share Data With

We do not share information about your child with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about your child with:

- Our local authority, Surrey County Council – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions.
- Educational Institutions that your child attends after leaving us.
- Government departments or agencies
- The Charity Commission
- Our regulator, the Independent Schools Inspectorate
- Suppliers and service providers:
 - Catering, Information Technology, Transportation & Trip providers
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

7.1 Transferring data internationally

We may use your information outside of the UK, but we will only do this in certain situations. For example, we may do this when your child or yourselves contact us from outside the UK, when the school makes arrangements for trips and travel abroad, when we contact previous schools your child attended abroad, or when you access our portal abroad. We will take steps to protect your personal information when this happens and may also let you know about this when it takes place.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your Rights

8.1 How to access personal information that we hold about your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about your child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that apply):

- Give you a description of it.
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
- Give you a copy of the information in an intelligible form.

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your child's data

Under UK data protection law, you have certain rights regarding how your child's personal data is used and kept safe. For example, you have the right to:

- Object to our use of your child's personal data
- Prevent your child's data being used to send direct marketing.
- In certain circumstances, have inaccurate personal data corrected.
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing.
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose.
- In certain circumstances, be notified of a data breach.
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

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

10. Contact Us

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

Our data protection officer is:

Mr Jon Philpott, Bursar

j.philpott@stainesprep.co.uk

However, our **data protection lead** has day-to-day responsibility for data protection issues in our school.

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

Mr Andrew Merriman, IT Manager

a.merriman@stainesprep.co.uk