



Privacy Notice for Parents and Carers of Pupils at Sir Thomas Rich's School (How we use parent information)

Introduction

Under 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 **parents and carers of pupils at our school**.

We, Sir Thomas Rich's School, are the 'data controller' for the purposes of data protection law. We have also appointed Gloucestershire County Council as our Data Protection Officer and they can be contacted on 01452 583619 or schoolsdpo@gloucestershire.gov.uk.

The categories of personal information that we collect, hold and share include:

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

- Contact details and contact preferences (such as your name, address, email address and telephone numbers)
- Bank details
- Details of your family circumstances
- Details of any safeguarding information including court orders or professional involvement
- Records of your correspondence and contact with us
- Details of any complaints you have made
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

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

- Any health conditions you have that we need to be aware of
- Photographs and CCTV images captured in school

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

Why we collect and use this information

- a. Report to you on your child's attainment and progress
- b. Keep you informed about the running of the school (such as emergency closures) and events
- c. Provide appropriate pastoral care
- d. Protect pupil welfare
- e. Administer admissions waiting lists
- f. Assess the quality of our services
- g. Comply with our legal and statutory obligations
- h. Process payments for school services and clubs

- i. Carry out research

Use of your personal data for marketing purposes

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

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).

We don't currently process any personal information through any automated decision making or profiling process. If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

Use of your personal data in automated decision making and profiling

We do not currently process any parents' or carers' 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.

Use of your personal data for filtering and monitoring purposes

While you are in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

The lawful basis on which we use this information

Under Data Protection legislation Sir Thomas Rich's is a Data Controller and holds the legal right to collect and use personal data, and we may also receive information from previous schools, LA and/or the DfE.

For most of the personal data we collect and use, we do so in order to meet the requirements the School is subject to in **performing a task in the public interest**. This applies to items **a** to **h** in the list above. The legal basis for this is set out in the UK GDPR and UK law, including those in relation to the following: Article 6 and Article 9 of the UK GDPR; Education Act 1996; Keeping Children Safe in Education (2016); Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013; The School Admissions Code.

For the purposes of **i** in the list above, in accordance with the **consent** basis – we will obtain consent from you (or your parents where appropriate) to use your personal data.

Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to process it for the establishment, exercise or defence of legal claimsWe 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 it's used 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 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 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 obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation

Collecting this data

Whilst the majority of information you provide to us is mandatory, there is some information that can be provided to us on a voluntary basis.

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 you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Your children
- Police forces, courts or tribunals

In order to comply with the General Data Protection Regulation, we will inform you whether you

are required to provide certain information to us or if you have a choice in this.

Storing data

Pupil data is held securely by the school. We may also keep it beyond their attendance at our school if this is necessary. For an overview of data retention please consult our Retention Schedule.

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

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

Who we share data with

We do not share information about you 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 data protection law), we may share personal information about you with:

- our local authority (Gloucestershire) – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Ofsted
- Suppliers and service providers (catering, school photographers, Parent Association Uniform Shop, data service providers)
- Statutory health providers who will be delivering mental health service delivery to pupils within the school.
- 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

Requesting access to your personal data

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

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may 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

To make a request for your personal information, contact the school on info@strs.org.uk or the Data protection officer (details at the end of this notice).

You also have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- 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

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance by contacting our Data Protection Lead (see below). Alternatively, you can contact the Information Commissioner's Office 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

Contacts - our data protection officer is:

Gloucestershire County Council School's Data Protection Team
Information Management Service
Shire Hall
Westgate Street
Gloucester
Schoolsdpo@gloucestershire.gov.uk
01452 583619

However, our Data Protection Lead has day-to-day responsibility for data protection issues in our school. If you have any questions, concerns or would like more information about anything

mentioned in this privacy notice, please contact: Mr David Dempsey (Deputy Headteacher) – dd@strs.org.uk; 01452 338406