



PRIVACY NOTICE FOR STAFF, PARENTS AND ALUMNI

Responsible member of SLT: Magdalena Jackson

Review date: January 2022

Next review: January 2025

About this Privacy Notice

This Privacy Notice relates to all sections of Alton School, including the Early Years Department.

The School identifies itself as the data controller for the purposes of the relevant legislations ("Data Protection Law"). A "Data controller" is an organisation that determines how people's personal data is processed and for what purpose.

This Privacy Notice is intended to provide information about how the School will use (or "process") personal data about individuals.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. All staff, parents and alumni are encouraged to read this Privacy Notice and understand the School's obligations to its community.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and its staff or the parents of pupils;
- any policies or notices applicable to staff concerning the handling of personal data;
- the School's policy on taking, storing and using images of children;
- the School's CCTV policy;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use Policy ICT

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice and the School's data protection policy, which also provides information about how personal data about those individuals will be used.

Responsibility for Data Protection

In accordance with the General Data Protection Regulations 2018 ('the Act'), the School has notified the Information Commissioner's Office of its processing activities. The School ICO registration number is: ZA384652 and its registered address is:

Alton Convent School, Anstey Lane, Alton, Hampshire, GU34 2NG

The School has appointed Mrs Magdalena Jackson (The Bursar) as Data Protection Co-ordinator who will endeavour to ensure that all personal data is processed in compliance with this policy and the Act.

Why the School needs to process personal data

In order to carry out its ordinary duties, the School may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special category types of data.

The School may, from time to time, need to process "special category data" regarding individuals. Special category data includes information about an individual's physical or mental health, race or ethnic origin, political or religious beliefs, sex life, trade union membership or criminal records and proceedings. Processing of special category data is restricted by further safeguards under the act to give extra protection to the privacy of the data subject and will only be processed by the School with the explicit consent of the appropriate individual, or as otherwise permitted by the Act as listed under Article 9 of the GDPR.

The School will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, and expects the following uses will fall within the category of its, and its communities' legitimate interests:

- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents and retain a record if appropriate for the purposes of future applications or openings;
- To provide education services (including SEN), career services, and extracurricular activities to pupils; monitoring pupils' progress and educational needs; and maintaining relationships with alumni and the School community;
- For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the School's performance;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;

- To monitor (as appropriate) use of the School IT and communications systems in accordance with the School Acceptable Use Policy ICT;
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School social media channels in accordance with the School policy on taking, storing and using images of children;
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations; and
- Where otherwise reasonably necessary for the School purposes, including to obtain appropriate professional advice and insurance for the School.

Types of Personal Data Processed by the School

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities)
- bank details and other financial information, e.g. about parents who pay fees to the School, and any anti-money laundering information we are required to collect by law;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- references given or received by the School about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
- images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School CCTV system (in accordance with the School policy on taking, storing and using images of children)

How the School collects data

Generally, the School receives personal data from the individual directly (or, in the case of pupils, from parents). However, in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual), or collected from publicly available resources.

Who has access to personal data and who the School shares it with

Occasionally, the School will need to share personal information relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the local authority).

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the Welfare Officer and appropriate staff or otherwise in accordance with express consent;
- pastoral or safeguarding files

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

The School is under duties imposed by law and statutory guidance, including the government publication titled Keeping Children Safe in Education, to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the School's Safeguarding Policy.

In accordance with Act, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

Data is also shared with third party software providers to enable pupils to access their own learning programmes and multiple platforms both within and out of the School.

How long we keep personal data

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Please refer to the School's Data Retention Policy for retention periods.

Incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how this policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, you should contact the Bursar.

Please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

Keeping In Touch and Supporting the School

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, including by sending

updates and newsletters, by email and by post. Unless the relevant individual objects, the School may also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Parents' Association and the Alumni
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School;

Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar in writing.

Rights of Access to Personal Data ("Subject Access Request")

Individuals have the right under the Act to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or for the School to stop processing it, but subject to certain exemptions and limitations. Any individual wishing to access their personal data should put their request in writing to the Bursar.

The School will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within statutory time-limits.

You should be aware that certain data is exempt from the right of access under the Act. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The School is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any reference given by the School for the purposes of the education, training or employment of any individual.

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. Pupils aged 12 or over are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. All subject access requests from pupils will therefore be considered on a case by case basis.

An individual with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the School may have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract).

Whose Rights

The rights under the Act belong to the individual to whom the data relates. However, the School will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent.

Parents should be aware that in such situations they may not be consulted.

In general, the School will assume that pupils' consent to disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the School opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School will maintain confidentiality unless, in the School opinion, there is a good reason to do otherwise; for example, where the School believes disclosure will be in the best interests of the pupil or other pupils.

All members of the School community are required to respect the personal data and privacy of others, and to comply with the School Acceptable Use Policy ICT and the School rules. Staff are under professional duties to do the same covered under the relevant staff policies.

Data Accuracy and Security

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Bursar of any changes to information held about them.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Act) and may do so by contacting the Bursar in writing.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under the Act.

Queries and Complaints

Any comments or queries on this policy should be directed to the Bursar.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law then they can make a complaint at any time in writing to the Bursar or by contacting the Information Commissioner, although it is recommended by the ICO that steps are taken to resolve the matter with the School before involving the regulator. The ICO helpline number is **0303 123 1113**.