

## G2 GDPR Student Privacy Notice

### COVID-19 RELATED PROCESSING

**While pandemic conditions persist, the school may need to collect, share and otherwise process personal data in accordance with Government guidance. This may be for reasons not specifically set out in this Privacy Notice but always for the purposes of protecting public and individual health by seeking to limit the spread of coronavirus (COVID-19).**

This Privacy Notice is intended to provide students with information about how the school will use (or "process") their data. It should be read alongside the school data protection policy which describes in detail how the data is collected, processed and retained (where appropriate).

### **Specifically for the Purpose of the School, the School Collects and Processes the Following Information:**

- Personal information (such as name, unique student number and 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)
- Assessment information - class marks, marks in tests, coursework, school exam results, public exam results, school reports and grades, and the results of assessment by outside agencies such as examination boards and the CEM centre.
- Medical information (including Physiotherapy and Counselling)
- Accident reports – when your child has been involved in an accident in school
- Dietary requirements
- Special Educational Needs Information
- Incident forms – if your child is involved in any behaviour which causes concern and might be reported to the Deputy Principal
- Suspensions/detentions
- Commendations
- Safeguarding referrals/Child Protection concerns
- Financial information relating to payment of fees
- Information submitted as part of the application process for MDS/School Bursary support.

We collect and use this data:

- to support your child's learning
- to monitor and report on your child's progress
- to provide appropriate pastoral care and safeguard and promote wellbeing
- to manage the MDS/School Bursary Scheme
- To collect fees
- to monitor your child's health
- to assess the quality of our services
- to comply with the law regarding data sharing

Most of the information we collect and keep is stored securely on the School's computer servers. This means that school staff can access this information when they need it. The information isn't available to others nor will it be stored on personal devices like tablets, laptops or computers at home, nor will school staff store information about you on their personal accounts such as Outlook or iCloud.

Sometimes the School will need to collect and keep information about you in 'hard copy', such as paper files. The School stores this information safely so that it is used only by those who need it. The School will destroy files relating to your child when they reach the age of 25. If there is safeguarding documentation about you as a result of a referral to Children's Services or the Police, this will be kept securely by the DSP until we have further advice from the Independent Inquiry into Child Sexual Abuse on how long the data should be retained.

The School will never sell, rent or trade this information about you (known by law as 'personal data').

The School will give the information it collects and stores about you to others only if the law says it must or if the school needs to do so to enforce what it is allowed to do by law.

None of our ICT service providers lie outside the EEA and therefore there is no reason why any of your data will be processed outside of the EEA.

## **Your Rights**

If you have any questions about how your personal data is used by the Purcell School you may contact Vice-Principal, Tom Burns at [t.burns@purcell-school.org](mailto:t.burns@purcell-school.org) or the Bursar, Adam Wroblewski [a.wroblewski@purcell-school.org](mailto:a.wroblewski@purcell-school.org) for more information.

The school will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (but only where Data Protection Law allows it, and in accordance with relevant regulatory guidance).

If you consider that the personal data we hold on you is inaccurate, please let us know. However, the school will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

You should be aware that GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – [please see further below]), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action, or where a duty of confidence is owed by a legal adviser).

Students 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. A student of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger students, the law still considers the information in question to be the child's. For older students, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Students at six form are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger students may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

In general, the school will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the school's opinion, there is a good reason to do otherwise.

However, where a student 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 may be under an obligation to maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the student or other students, or if required by law.

Students are required to respect the personal data and privacy of others, and to comply with the school's policies and the school rules. Staff are under professional duties to do the same covered under the relevant staff policy.

<b><i>Policy author / reviewer:</i></b>	<b><i>Policy date / review date:</i></b>	<b><i>Next review due:</i></b>
J Harding	May 2018	September 2020
Paul Bambrough	January 2020	January 2021
Adam Wroblewski	September 2021	September 2022
Adam Wroblewski	September 2022	September 2023