



STRATFORD GIRLS' GRAMMAR SCHOOL

STRATFORD-UPON-AVON

Privacy Notice for Parents and Students

How we use your information

Disclosable under Freedom of Information Act 2000	Yes
To be published on website	Yes
Policy ownership	
Governor committee:	Curriculum, Leadership & Management
Department responsible:	Data Officer
Post-holder: (title and name)	Jill Lawrence & Jane Emms, Data Officers
Responsible person	Jacqui Cornell
Implementation date	July 2018
Planned review interval	Every year
Planned next review date:	June 2022

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1. Who are we?

Stratford Girls' Grammar School ('the School') is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Stratford Girls' Grammar School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z3198676

You can contact the Academy Trust as the Data Controller in writing at:
Stratford Girls' Grammar School, Shottery Manor, Stratford-upon-Avon, CV37 9HA.

2. 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.

3. 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.

4. What personal information do we process about students and parents/carers?

The student and parent information that we collect, hold and share includes:

- Personal information including a student's name, date of birth, unique student number and home address
- Characteristics such as ethnicity, language and free school meal eligibility
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of students' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and email addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.

5. Why do we use personal information?

We use student data:

- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to assess the quality of our services

- to comply with the law regarding data sharing
- to safeguard students
- to share medical information with public health agencies

6. 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 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.

7. 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 we have 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 Academy Trust by law. We therefore are required to process this personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Academy Trust in writing.

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.

Details of the type of processing that we may undertake on this basis and who we may share that information with is set out in Table 2.

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.

Details of the type of processing that we may undertake on this basis and who we may share that information with is set out in Table 3.

4) To perform a public task

It is a day-to-day function of Stratford Girls' Grammar 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.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

Please be aware that an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the School to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the School will consider the reasons for the objection and balance this against the legitimate grounds to process data.

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:

- i. Explicit consent of the data subject
- ii. Processing relates to personal data which is manifestly made public by the data subject
- iii. Necessary for establishing, exercising or defending legal claims
- iv. Necessary for reasons of substantial public interest
- v. Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- vi. Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

8. Who might we share your information with?

We routinely share student information with:

- Schools that the students attend after leaving us
- our Local Authority
- the Department for Education (DfE)
- Exam Boards
- External bodies that help us to monitor progress (eg Fischer Family Trust (FFT), ALPS)
- Local Authority (or representative) re monitoring post-16 destinations (Youth Services) – student and parent contact details
- FoS (friends of Stratford Girls' Grammar)
- Cunninghams (School Catering System)
- GL Assessments and MIDYIS (baseline assessment providers)
- ParentPay
- Education Software providers: Exampro, Unifrog, Kerboodle, Activelearn, Linguascope, Zigzag, MyMaths
- MStore document storage provider
- Information Management software (SIMS)
- Home-School communication app (Edulink)
- Conferencing software for homework and home learning (Microsoft Teams)
- Local Public Health team
- NHS Test and Trace

We do not share information about our students or parents/carers unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

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>.

NHS Test and Trace/Public Health Agencies:

It may be necessary for us to share limited information with the above agencies in the event that an individual tests positive for Coronavirus, or if there is a Coronavirus outbreak. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an outbreak.

You have the right to object to the sharing of information with such agencies. This is not an absolute right and will be assessed on a case by case basis.

9. 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 for. The Academy Trust 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 (as set out above).

10. How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link: <https://ico.org.uk/media/about-the-ico/policies-and-procedures/2259025/retention-and-disposal-schedule-for-website.pdf>

11. Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

12. What are your rights with respect of your personal information?

Under data protection law, parents/carers and students have the right to request access to information about them that we hold. To make a request for your personal information**, or to have access to your child's educational record, contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively in writing to;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick

CV34 4RL

****Please ensure you specify which school your request relates to.**

You also have the right to:

- object to processing of personal data that is likely to cause or is causing damage or distress
- 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

When exercising this right, individuals should contact the School to inform them of the 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.

Table 1: Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
<i>Special Education Needs Report</i>	<i>Children’s and Families Act 2014, section 69</i>		<i>Local Authority</i>	<i>Legal Obligation</i>
<i>Attendance register</i>	<i>Education (Student Registration)(England) Regulations 2006, Regulation 4, 10, 11 and 12</i>		<i>OFSTED, Local Authority</i>	<i>Legal Obligation</i>
<i>Common Transfer file</i>	<i>Education (Student Registration)(England) Regulations 2005, Regulation 6</i>		<i>Other schools – when students transfer.</i>	<i>Legal Obligation</i>
<i>Safeguarding information</i>	<i>Education Act 2002, section 175 Children’s Act 1989, Section 17, 47, 83. Children’s Act 2004, Section 11</i>		<i>Local Authority</i>	<i>Legal Obligation</i>
<i>Admissions Register</i>	<i>Education (Student Registration)(England) Regulations 2006, Regulation 4, 10, 11, 14 and 15</i>		<i>OFSTED, Local Authority</i>	<i>Legal Obligation</i>
<i>Curricular Record including Assessment and achievement data</i>	<i>Education (Student Information) (England) Regulations 2005, Regulation 4</i>		<i>OFSTED, Other schools – when students transfer. Local Authority</i>	<i>Legal Obligation</i>
<i>Educational Record</i>	<i>Education (Student Information) (England) Regulations 2005, Regulation 5 and 6</i>		<i>Parents, Other schools – when students transfer.</i>	<i>Legal Obligation</i>
<i>Student Information i.e name, age address, Emergency contact details, school email address</i>	<i>Education (Information About Individual Students) (England) Regulations 2013, Regulation 3 and 5</i>		<i>Department of Education – school census. Other schools – when students transfer. Local Authority (or their representative) for purposes of confirming post 16</i>	<i>Legal Obligation</i>

			<i>placement/NEET</i>	
<i>School Census</i>	<i>Education Act 1996, Sections 537 & 537A, and accompanying regulations</i>		<i>Department of Education & Local Authority</i>	<i>Legal Obligation</i>
<i>Staff information, including personal details, DBS check, qualifications</i>	<i>Education Act 2005, section 114</i>		<i>Secretary of State, Warwickshire County Council, Disclosure and Barring Service</i>	<i>Legal Obligation</i>

Table 2: Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
<i>Medical Information</i>	<i>Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'</i>	<i>Medical staff i.e. paramedics/ambulance</i>	<i>Vital Interest</i>

Table 3: Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
<i>Photographs</i>		<i>Media organisations</i>	<i>Consent</i>
<i>Parent Email address</i>		<i>FoS (Ticketing information)</i>	<i>Legitimate Interest</i>
<i>Parent contact numbers</i>		<i>FoS (Safeguarding of Students attending events)</i>	<i>Public task</i>
<i>Biometric data (fingerscans)</i>	<i>Consent</i>	<i>Cunninghams Catering System</i>	<i>Consent</i>

Table 4: Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
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<p><i>Student Information eg. name, age, address, Parent detail, Emergency contact details</i></p>		<p><i>Department of Education – school census. Other schools – when a student transfers Local authority (or their representative) for purposes of confirming post 16 placement/NEET EduLink (Parent Communication App)</i></p>	<p><i>Legal Obligation</i></p> <p><i>Public Task – to complete administrative responsibilities</i></p>
<p><i>Academic Progress data, Learning journals Staff observations Exam Results</i></p>		<p><i>OFSTED, Department of Education, Exam Boards Local Authority, Parents (via EduLink), Health such as Speech and Language, Other schools, ie when students transfer. FFT, ALPS Future employers of students Local Press</i></p>	<p><i>Legal Obligation</i></p> <p><i>Consent Consent</i></p>
<p><i>Student Information eg name, age, school email address</i></p>		<p><i>Education Software providers: Exampro, Unifrog, Kerboodle, Activelearn, Linguscope, Zigzag, MyMaths</i></p>	<p><i>Public Task – use as integral part of students' education</i></p>
<p><i>Safeguarding information, Medical, Special Education Needs</i></p>	<p><i>Necessary for preventive and occupational medicine and in an emergency, necessary to protect the vital interest of the data subject</i></p>	<p><i>Local Authority, Health, Parents if appropriate Department of Education – school census.</i></p>	<p><i>Legal Obligation</i></p>
<p><i>Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.</i></p>		<p><i>Local Authority, Health, Parents if appropriate Medical Professionals Police</i></p>	<p><i>Legal Obligation</i></p>