



STRATFORD GIRLS'
GRAMMAR SCHOOL

STRATFORD-UPON-AVON

Privacy Notice for Parents and Students

How we use your information

Department responsible:	Data Office
Post-holder: (title and name)	Jane Emms, Data Manager
Responsible person	Jacqui Cornell, Headteacher
Implementation date	July 2018
Planned review interval	Every year
Planned next review date:	June 2027

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/carers.

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/carer 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 with 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 or a student's home Local Authority
- The Department for Education (DfE)
- Bromcom (School Management Information System)
- Exam Boards
- External bodies that help us to monitor progress (eg Fischer Family Trust (FFT), SISRA)
- Local Authority (or representative) re monitoring post-16 destinations (Youth Services)
- Data transfer services – Groupcall and Wonde (to share data with DfE, FFT, RMP, Unifrog)
- FoS (Friends of Stratford Girls' Grammar)
- Iris Biostore (School Biometric System)
- InVentry (signing in/out system)
- Caterlink (School Catering)
- GL Assessments and MIDYIS (baseline assessment providers)
- ParentPay
- Education apps: Kerboodle, Activelearn, Zigzag, MyMaths, MathsWatch, Tonesavvy, MyTutor, Dev Clever, Adapt
- Careers apps: Unifrog, Compass+
- Sixth form application software: Applicaa
- Educational Competitions: RSC, UK Mathematical Trust, UK Biology Competitions, Cyber Explorers, Ritangle (MEI)
- Wrates: school photographer
- Home-School communication app: Reach More Parents (RMP)
- Progress Evening booking system (SchoolCloud)
- Conferencing software for homework and home learning (Microsoft Teams)
- Local Public Health team, including the Immunisation & Vaccination Service

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>.

Public Health Agencies:

It may be necessary for us to share limited information with the above agencies in the event of a national health issue or emergency. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an event.

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, Stratford Girls' Grammar School complies with the Retention Schedules provided by the School Data Protection Officer at Warwickshire Legal Services. The schedules set out the Statutory Provisions under which the Stratford Girls' Grammar School are required to retain the information

A copy of those schedules can be obtained on request.

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;
- claim compensation for damages caused by a breach of the Data Protection regulations
- Subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a concern about how your personal data has been handled, please contact our Data Protection Lead (DPL) or our Data Protection Officer (DPO). This gives us the opportunity to investigate and resolve the matter as quickly as possible.

There is no set format for making a data protection complaint. However, submitting your complaint in writing may help us to respond more promptly. Please direct your complaint to:

- School Data Protection Lead (DPL) email: emms.j@sggs.org.uk
- School Data Protection Officer (DPO): schooldpo@warwickshire.gov.uk

What to Expect from Us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires.

Throughout the process, we will:

- Keep you informed of our progress.
- Request any additional information we may need from you in a timely and proportionate manner.
- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights. For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

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 processing
<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, DfE, Wonde</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/carers, Other schools – when students transfer.</i>	<i>Legal Obligation</i>
<i>Student Information i.e name, age address, Emergency contact details, school email address, PP, FSM, ethnicity, SEN</i>	<i>Education (Information About Individual Students) (England) Regulations 2013, Regulation 3 and 5</i>	<i>Necessary for preventative or occupational medicine Necessary for archiving, historical research or statistical purposes in the public interest.</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>

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 processing
<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 Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health</i>	<i>Medical staff i.e. paramedics/ambulance Caterlink (food allergy information)</i>	<i>Vital Interest</i>

Table 3: Personal information we 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 processing
<i>Photographs</i>	<i>Explicit Consent</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>Consent and Public task</i>
<i>Biometric data (fingerscans)</i>	<i>Explicit Consent</i>	<i>Iris Biostore/Caterlink</i>	<i>Consent and Public task</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 processing
<i>Student Information eg. name, age, address, Parent detail, Emergency contact details, Ethnicity, PP, FSM, SEN</i>	<i>Necessary for preventive or occupational medicine Necessary for archiving, historical research or statistical purposes in the public interest</i>	<i>Department of Education – school census/attendance tracking Other schools – when a student transfers Local authority (or their representative) for purposes of confirming post 16</i>	<i>Legal Obligation and Public Task Legal Obligation and Public Task</i>

		placement/NEET Wrates – pupil photos stored for safeguarding purposes Groupcall – for transfer to FFT/Compass+ Wonde – for transfer to DfE (attendance tracking) and parent app (Reach More Parents) Reach More Parents (Parent Communication App) Bromcom (MIS) InVentry (signing in/out) SchoolCloud (Progress Evenings Booking) NHS Immunisation Service Caterlink	Public Task
Academic Progress data, Attendance marks Learning journals Staff observations Exam Results		OFSTED, Department of Education Bromcom (MIS) Exam Boards Local Authority, Parents/carers (via RMP), Health such as Speech and Language, Other schools, ie when students transfer. FFT, SISRA Groupcall – for transfer to FFT/Compass+ Wonde (for transfer of Attendance Marks to other LA and DfE) Future employers of students Local Press, Applicaa (post-16 applications)	Legal Obligation and Public Task Consent
Student Information eg name, age, school email address		Education/Careers Software providers: Unifrog, Compass+, Kerboodle, Activelearn, Zigzag, MyMaths, MathsWatch, Tonesavvy, Dev Clever. Educational Competitions: Royal Society of Chemistry, UK Mathematical Trust, UK Biology Competitions, Adapt, Cyber Explorers, Ritangle (MEI), Applicaa (post-16 applications)	Public Task – use as integral part of students' education

<i>Safeguarding information, Medical, Special Education Needs</i>	<i>Necessary for preventive and occupational medicine and in an emergency, necessary to protect the vital interest of the data subject</i>	<i>Local Authority, Health, Parent/carers if appropriate Department of Education – school census.</i>	<i>Legal Obligation and Public Task</i>
<i>Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.</i>		<i>Local Authority, Health, Parent/carers if appropriate Medical Professionals Police</i>	<i>Legal Obligation and Public Task</i>