



Privacy notice for Parents and Pupils

St Peter's School, York

September 2022

(Next review Christmas term 2024)

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

Who Collects This Information

St Peter's York is a "data controller." This means that we are responsible for deciding how we hold and use personal information about pupils and parents.

We may collect, store and use the following categories of personal information about you:

Categories of Pupil Information We Collect, Process, Hold and Share

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special educational needs information;
- Relevant medical information;
- Special categories of personal data (including [biometric data, ethnicity, relevant medical information, special educational needs information]);
- Images of pupils engaging in school activities, and images captured by the School's CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Recordings of pupils and/or parents from the School's video conferencing platform.

Collecting this Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

How We Use Your Personal Information

We hold pupil data and use it for:

- Pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, sports or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- To provide effective communication
- Informing decisions such as the funding of schools;
- Assessing performance and to set targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy;
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the School's policy on taking, storing and using images of children;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
- To provide support to pupils after they leave the school.
- 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;

- Medical records - medical records will only be accessed by the school's medical staff responsible for the care of a child. However, that information may also be shared with others such as the school doctor or school staff where it is in the interests of the child or necessary for us to fulfil our duty of care or otherwise in accordance with express consent;
- the purpose of research and fundraising, such as tracking relationships, donation history and attendance at events that are run by the Development and Alumni Office.

The Lawful Basis on which we use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share pupil information with:

- Third party companies for Educational purposes
- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Ofsted;
- Other Schools that pupils have attended/will attend;
- NHS;
- Doctors surgery;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors (e,g lawyers, insurers, PR advisers and accountants);
- Support services (including insurance, IT support, information security);
- Providers of learning software such as e.g. Time Tables Rockstar, Edukey and
- The Local Authority.
- The Joint Council for Qualifications (JCQ)
- GL Assessments
- CEM
- Exam boards (OCR, Edexcel AQA)
- Eduqas
- Cambridge Assessments
- UCAS

- UniFrog
- Appropriate regulatory bodies (e.g. the Independent Schools Inspectorate, the Independent Schools Council, the Health and Safety Executive)

Recently the Department for Education have requested more regular data sharing on pupil attendance to help support those vulnerable and to assist with intervention strategies. Further information on how the Department for Education collects this data will be made available on the School website.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We do not share information about our pupils with anyone without consent unless otherwise required by law.

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 - medical records will only be accessed by the school's medical staff responsible for the care of a child. However, that information may also be shared with others such as the school doctor or school staff where it is in the interests of the child or necessary for us to fulfil our duty of care or otherwise in accordance with express consent;
- Pastoral or safeguarding files - will only be accessible on a "need to know" basis to certain school staff members. However, that information may also be shared with others such as the school doctor or LADO where it is in the interests of the child or necessary for us to fulfil our duty of care or otherwise in accordance with express consent.

Why we Share this Information

For example, we share students' data with the DfE on a statutory basis which underpins school funding and educational attainment. To find out more about the data collection requirements placed on us by the DfE please go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including 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 and Child Protection Policy](#).

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.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers 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. The School may use some products or services (or parts of them) that may be hosted/stored on the cloud or servers operated outside the European Economic Area ("EEA"). Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for the data we hold. Our service providers operate data protection measures at standards which are compliant with the requirements of and standards expected under UK GDPR.

Storing Pupil Data

The School keep information about pupils on computer systems and sometimes on paper. The majority of data is stored on the school MIS (iSAMS) and the Alumin database (Raisers Edge). For more information on what is stored in Raisers Edge please see Alumni Privacy Policy

Except as required by law, the School only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.

Full details on how long we keep personal data for is set out in our data retention policy, this can be requested from the Head Master's PA.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in limited circumstances.

Pupils will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention policy. This document be requested from the Head Master's PA.

The independent inquiry into child sexual abuse (IICSA) has emphasised the need to keep some types of pupil records indefinitely.

Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way).

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, or alumni and parent events of interest, 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 Old Peterite Association and School Parent and Teacher Committees.
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes;
- Should you wish to limit or object to any such use, or would like further information about them, please contact Judicium Consulting and indicate that your request relates to St Peter's School, York: dataservices@judicium.com

You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Requesting Access to your Personal Data

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with our Data Manager in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by our Data Manager, then you can contact the DPO on the details below:

Judicium Consulting stating that it is in relation to St Peter's School, York:

72 Cannon Street, London, EC4N

6AE

Email: dataservices@judicium.com

Web:

www.judiciumeducation.co.uk

Telephone: 0203 326 9174

Data Protection Officer: Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.