



St George's
School Edgbaston

PRIVACY POLICY FOR PARENTS

Revised: July 2018



Who are we?

We are St George's School and our address is 31 Calthorpe Road, Edgbaston, Birmingham, B15 1RX. We are the data controller of personal information about you.

If you have any questions about this policy or how we are using your personal information, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

What is this privacy policy about?

This privacy policy tells you how we use your personal information as a parent or guardian of a pupil at our School. This privacy policy answers the following questions – please click on the heading to take you to the section of this privacy policy that you would like to read:

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What personal information do we collect about you when you are a prospective or current parent/guardian of a pupil at our School?

We will collect personal information from you when your child becomes a pupil at our School. This will be your name, address, contact details, financial details, and marital status and information about the payments you make, information about your job, permissions you give for your child to attend trips or participate in other activities, and any communication which contains personal information which we have with you via email, letter or phone.

If you register your interest for your child to become a pupil at our School we will collect your contact details so that we can get in touch with you about our School.

If you visit the School, we will also collect the following information from you: name, times you arrive and leave, car registration details if you have driven here, who you are visiting and any information you give us at meetings/parents evenings you have with us.

We have CCTV on our premises for security and safeguarding reasons, to record any injuries and accidents sustained on School grounds and for identification purposes and may therefore collect images of you on our CCTV systems.

We will also collect sensitive or special categories of personal information from you when your child is registered as a pupil at our School. This will be information about your health (including any medical condition or disability) so we can make appropriate provisions for you to visit us.

What personal information do we collect about your child when you are a prospective or current parent/guardian of a pupil at our School?

Where your child is too young or unlikely to understand the Pupil Policy we are required to let you know what personal information we collect about them and our legal basis for doing so.

Admissions: We will collect personal information from your child and their previous school when they apply to become a pupil at our School. This will be: name, address, contact details, date of birth, information about their family and emergency contacts, the languages they speak, information about their school history and attendance, information that we get from their previous school, information we need for safeguarding pupils, details of academic achievement and exam results, dietary

requirements, behavioural information, how they travel to school, and any other information you, your child, local authorities or solicitors give us.

We will also collect sensitive or special categories of personal information from your child when they apply to become a pupil at our School. This will be: ethnicity, religious beliefs, information about their health, including any medical condition, allergies or disability so we can make appropriate provisions for them and information about any criminal behaviour and also to comply with legislations for the census returns. We also take a copy of the child's passport and/or birth certificate for proof of identity and date of birth.

During their time as a pupil: We will collect and put together additional information about your child during their time at our School. This will be: absence information, information on academic achievement classwork/homework/display work, pastoral care information (which means personal information they might disclose to us about their health and well being), assessment and exam grades, School reports, notes that their teachers make about their performance and well being, the classes they are in and their timetable, sports team memberships, club memberships, hobbies, interests, work experience, safeguarding information for example student incident reports, medical incident reports, behaviour information, dietary needs (such as their allergies), signing in/out forms, how they use our printers, the programs they use on our computers, the websites they have accessed on our computers, photos, passport information, visas for School trips and notes taken during parents evenings or meetings with their teachers.

We will collect and put together sensitive or special categories of personal information about your child during their time as a pupil at our School. This will be: medical information relating to sickness absence or absence due to medical appointments, medical notes from hospitals/doctors where this is relevant to us ensuring their medical and health needs are met, reports from other professionals relating to safeguarding, medical and behavioural information.

We have CCTV on our premises for security and safeguarding reasons, to record any injuries and accidents sustained on School grounds and for identification purposes and may therefore collect images of your child on our CCTV systems.

How do we use your personal information when you are a prospective or current parent/guardian of a pupil at our School?

We will use your personal information to:

- meet our safeguarding obligations;

- deal with any issues that arise with your child;
- monitor visitors to our School for security and health and safety reasons;
- verify your details and identity;
- communicate with you about things you need to know about, for example School closures;
- tell you about our School;
- send you communications about us and about opportunities, events, open days and news about the School that we think will interest you;
- assess eligibility for financial assistance for your child;
- perform the parent contract we have with you;
- send you bills and administer your account;
- facilitate the collection of fees and process payments, including making claims if you fail to pay; and
- report any information and issues we are required to report, for example to the local authority or the police.

How do we use your child's personal information?

We will use your child's personal information to:

- check their details and identity;
- assess whether to admit them as a pupil;
- review their educational history and exam results;
- communicate with them;
- manage and administer their education and learning;
- review their performance;
- make reports and registers and assign them to classes;
- make arrangements for exams;
- assist them with or administer applications to colleges and universities for purpose of references;
- consider whether any other special arrangements are needed for them such as making arrangements to accommodate any disability;
- arrange School trips and visits;
- safeguard them, including reporting issues to the local authority or police if we need to;
- provide information about them to other schools when they leave;
- meet their dietary and health requirements;
- administer the permissions you have given for them to attend trips and participate in activities;
- arrange for work experience;

- arrange for them to attend School sports events;
- arrange for them take part in after School clubs and extra-curricular activities;
- arrange medical treatment where required (e.g. if you are injured in a sporting fixture);
- publish photographs of you on the School website or on social media where we have consent to do this;
- publish exam results; and
- publish sporting fixtures and School news.

What is our legal basis for using your personal information when you are a prospective or current parent/guardian of a pupil at our School?

Where you have registered your interest to hear from us as a prospective parent/guardian, or where you are a current parent/guardian of a pupil at our School, we will send you communications about us and about opportunities, events, open days and news about the School that we think will interest you on the basis of your consent. If you change your mind about hearing from us at any time, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

We use your personal information on the basis that it is necessary to take steps before entering into a parent contract with you and then it is necessary for performing the parent contract with you. We also collect and use your personal information on the basis that we need to do so in order to comply with our legal obligations to safeguard our students under the Education Act 2002 and the Education (Independent School Standards) Regulations 2014.

Where we collect special categories of personal information, such as information about your health, (including any medical condition or disability so we can make appropriate provisions for you to visit us) we do so on the basis that you have consented for us to hold this information.

What is our legal basis for using your child's personal information?

Under data protection laws, we need to have a legal reason or basis to use your child's personal information. We have explained these in this section.

The School uses your child's personal information on the basis that it is necessary for us to do so to pursue our legitimate interests. We have a legitimate interest in providing and administering your child's education and learning (including extra-curricular activities such as clubs, trips and sporting activities) and running the School. The information we collect or generate is necessary for this purpose and we consider that how we use it is proportionate. For further information on our

legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

Where we are subject to a legal obligation e.g. in relation to health and safety or safeguarding we will also use your child's personal information (where relevant) to meet our obligation. For example, where the School has a concern about your child's health or wellbeing we may have to report this concern and disclose their information to the relevant authorities such as the police, children services and the Courts.

We will publish your child's photographs on our website or on social media on the basis of the consent we get from our photographic consent form.

Where we collect your child's sensitive or special categories of personal information e.g. where we keep allergy information, we do this on the basis that it is in our legitimate interests to do so and on the basis that it is necessary for the management of health care and is under the supervision of the School Nurse.

There may be situations where your child is unable to consent for us to disclose their medical records to healthcare professionals for example where they have been injured. Where we disclose your child's medical records on these occasions, we do so on the basis that it is in their vital interests to receive appropriate medical care.

Who will we share your personal information with?

We will only share the personal information that you give us with the following third parties and for the following reasons:

- **With third parties who provide or support our IT systems:** We use reputable third parties to provide us with our IT systems and support for them, for example SIMS and CPOMS. They may access your personal information to the extent that they need to in order to provide their services or provide support to us as our processor;
- **With third parties who provide systems and support for education and learning:** We use reputable third parties (for example ParentMail, ParentPay, Schools Fee Plan, ISI, DFE (S2S, Collect)) to assist with providing our education and learning to pupils. They may access your personal information to the extent that they need to in order to provide their services or provide support to us as our processor;
- **In the unlikely event that we merge with or transfer our School assets:** If we sell all or part of our School, or merge with another company, we may transfer personal information that we have collected as described in this privacy

policy, along with our other School assets, to the organisation that we are selling to or merging with. The legal ground for this is that it is in our legitimate interests to be able to merge or sell our School. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk;

- **With entities, companies or individuals outside our School for legal reasons:** We will share your personal information with entities, companies or individuals outside our School where it is necessary to comply with any law, rule, regulation, legal procedure or governmental request that is applicable to us, for example sending financial information to HMRC and sending information about our School to the Department for Education. We also have legal obligations (including in relation to safeguarding children) to report issues that arise or that are reported to us if they meet a certain level of seriousness and this may need to take place whether or not the issues are proven. This may include referrals to relevant authorities such as the LADO, the local authority or the police. The legal ground for this is that sharing your personal information in this way is necessary in order for us to comply with our legal obligations; and
- **With entities, companies or individuals outside of our School to obtain advice:** We also share your personal information with external professional advisors such as lawyers accountants, medical practitioners and educational consultants in order to take advice and for the purposes of legal and tribunal proceedings. The legal ground for this is that it is in our legitimate interests as a school to be able to obtain professional advice from our external advisors about issues that may arise within our School. Where the information is sensitive or special categories of information (e.g. where medical information) we will only do so where it is necessary for the management of health care or in connection with legal claims. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

Who will we share your child's personal information with?

We will only share your child's personal information with the following third parties and for the following reasons:

- **With Examination Boards and Universities/Colleges:** We will provide the personal information that an examination board needs when we are entering your child into examinations. We will also provide relevant personal information to universities/colleges where they are applying there. The legal ground for this is that it is in our legitimate interests to do this. For further

information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk;

- **With Other Schools:** If your child moves to a new school we will provide their personal information to that school. The legal ground for this is that it is in our legitimate interests to do this. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk;
- **With third parties who provide or support our IT systems:** We use reputable third parties to provide us with our IT systems and support for them, for example SIMS and CPOMS. They may access your child's personal information to the extent that they need to in order to provide their services or provide support to us as our processor;
- **With third parties who provide systems and support for education and learning:** We use reputable third parties (for example epraise, bSquared, ParentMail, ParentPay, Kerboodle, Accelerated Reader, Unifrog, Schools Fee Plan, Pearson Active Teach, PrimeTimetable, ISI, DFE (S2S, Collect), BugClub, Literacy Planet, Nessy, Cogmed, Testwise) to assist with providing our education and learning to pupils. They may access your child's personal information to the extent that they need to in order to provide their services or provide support to us as our processor;
- **With third parties when you are taking a trip outside the School, for example travel companies, places you are going for work experience and hotels:** We will share your child's personal information with companies outside the School where we are arranging a School trip or work experience or other external visits. The legal ground for this is that it is in our legitimate interests to be able to use reputable third parties to provide these services to us. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk;
- **In the unlikely event that we merge with or transfer our School assets to:** If we sell all or part of our School, or merge with another school, we may transfer personal information that we have collected as described in this privacy policy, along with our other school assets, to the organisation that we are selling to or merging with. The legal ground for this is that it is in our legitimate interests to be able to merge or sell our School. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk;
- **With entities, companies or individuals outside of our School for legal reasons:** We will share your child's personal information with entities, companies or individuals outside St George's School where it is necessary to comply with any law, rule, regulation, legal procedure or governmental request

that is applicable to us, for example sending information about our School to the Department for Education and sending information about your results to exam boards. We also have legal obligations (including to safeguard children) to report issues that arise or that are reported to us to relevant authorities, medical professionals or the police. The legal ground for this is that sharing your child's personal information in this way is necessary in order for us to comply with our legal obligations; and

- **With entities, companies or individuals outside of our School to obtain advice:** We also share your personal information with external professional advisors such as lawyers, accountants, medical practitioners and educational consultants in order to take advice and for the purposes of legal and tribunal proceedings. The legal ground for this is that it is in our legitimate interests as a school to be able to obtain professional advice from our external advisors about issues that may arise within our School. Where the information is sensitive or special categories of information (e.g. where medical information) we will only do so where it is necessary for the management of health care or in connection with legal claims. For further information on our legitimate interests, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

Do we use your personal information to make automated decisions?

You will not be subject to decisions that will have a legal or significant impact on you based solely on automated decision-making which means there will always be human involvement in the decisions that we make about parents/guardians of our pupils and we don't make decisions using only computer technology.

Do we use your child's personal information to make automated decisions?

Your child will not be subject to decisions that will have a legal or significant impact on them based solely on automated decision-making which means there will always be human involvement in the decisions that we make about pupils and we don't make decisions using only computer technology.

What happens when your child leaves the School?

When your child leaves the School and becomes a member of our alumni network, we will keep some information about them and we will ask them if they want to keep hearing from us. Please read our privacy policies for alumni to find out more about this. You can find it on the School website.

What happens if you don't provide the personal information we ask for?

If you don't provide the personal information we need, we may not be able to perform our parent contract with you (such as taking on your child as a pupil), or we may not be able to comply with our legal obligations (such as to ensure the health and safety of our pupils). If you have any concerns about whether you need to provide the personal information, please get in touch with us using the contact details at the start of this privacy policy.

How long will we keep your personal information?

We will keep the personal information that we have about you as a parent of one of our pupils for the period of time specified on our Data Retention Schedule in order to comply with our legal obligations. For further information, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

If a dispute arises between us, we will hold on to your personal information so that we can deal with the dispute and this may mean that we keep your personal information for longer than this period.

We will ensure that your personal information is securely deleted after the periods stated above.

How long will we keep your child's personal information?

We will keep the personal information that we have about your child as one of our pupils for the period of time specified on our Data Retention Schedule in order to comply with our legal obligations. For further information, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

If a dispute arises between us, we will hold on to your child's personal information so that we can deal with the dispute and this may mean that we keep their personal information for longer than this period.

We will ensure that your child's personal information is securely deleted after the period stated above.

Will we transfer yours or your child's personal information outside the European Economic Area?

We store personal information in the United Kingdom or in countries within the European Economic Area ("EEA").

We will only transfer yours or your child's personal information outside the EEA where our third party service providers who we share personal information with (as set out above) are based outside the EEA, have support services located outside the EEA or host personal information outside the EEA.

We only transfer yours or your child's personal information outside the EEA where we have a legal ground for doing so and where we ensure that the personal information is protected to the same standard as it would be protected in the UK. We do this by entering into data sharing agreements with the recipients of the personal information based outside the EEA which comply with the EU Commission's standard clauses for the transfer of personal information, or where the third party is based in the US and is part of the US Privacy Shield.

If your child is leaving our School to attend one overseas, we may transfer their personal data to their new school on the basis that they (or you if they are below the age of 13) have consented for us to do so.

If you would like further details about our transfer of yours or your child's personal information outside the EEA, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

Yours and your child's rights over your personal information

Both you and your child have a right to make a complaint at any time to the Information Commissioner's Office (ICO), (the UK regulator for data protection issues. See <https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so, if you are happy to do so, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk in the first instance and we will try to resolve your issue.

Both you and your child have a number of other rights over your personal information, which are:

- the right to ask us what personal information we have about you or your child and to have a copy of your (or your child's) personal information from us;
- the right to ask us to correct any errors in your (or your child's) personal information;
- the right to object to our legitimate interests and our profiling activities where these are based on our legitimate interests;
- the right to object to us sending you (or your child) marketing communications;

- the right to ask us to provide you (or your child) with a copy of the personal information you (or your child) have provided to us, in a structured, commonly used and machine-readable format and the right to transmit that personal information to another entity where: (i) we are using personal information on the basis of consent or on the basis that it is necessary to perform a contract with you; and (ii) the use we are making of yours (or your child's) personal information is carried out by automated means;
- the right to ask us to delete your (or your child's) personal information where: (i) we don't need it anymore; (ii) you (or your child) withdraw consent to our use of your (or your child's) personal information and we have no other legal basis to keep it ; (iii) you have asked us to review and explain our legitimate interests and we don't actually have a valid legitimate interest to do what we are doing; (iv) our use of your (or your child's) personal information is illegal; (v) we have to delete your (or your child's) personal information to comply with our legal obligations;
- the right to ask us to restrict the use that we are making of your (or your child's) personal information where: (i) you (or your child) don't think the personal information we have about you (or your child) is correct, so that we can check if it is correct; (ii) what we are doing with your (or your child's) personal information is illegal but you would rather we stop using your (or your child's) personal information rather than delete it; (iii) we don't need your (or your child's) personal information anymore, but you (or your child) need us to keep it so that you can exercise any legal rights; and (iv) you have asked us to review and explain our legitimate interests, so you (or your child) can check whether we actually have a valid legitimate interest to do what we are doing;
- the right to ask us to transfer your (or your child's) personal information in certain circumstances; and
- where the use of your (or your child's) personal information is based on consent, the right to withdraw consent at any time by contacting us at dpo@sgse.co.uk.

If you would like to exercise any of these rights over your personal information, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

How we'll tell you about changes to this privacy policy

We keep our privacy policy under regular review. Any changes we make to our privacy policy will be published in an updated privacy policy on our website. Any major changes to this document will be communicated with you via email.