



St George's
School Edgbaston

PRIVACY POLICY FOR PUPILS

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?

As your School, there are legal rules about how we can use information about you, known as your personal information. This is called **data protection law**. We have to tell you about how we are using your personal information and what your rights are over your personal information. That's what this privacy policy is for.

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 does data protection law do?

Data protection law protects your personal information. This is anything that identifies you, for example your name, address, date of birth, previous schools, exam results and dates of attendance.

Under data protection law, some information about you is called “sensitive” or “special” information. This includes your racial or ethnic origin, political opinions, religious or philosophical beliefs, biometric data such as your fingerprints, and information about your health or sexual orientation. We have to treat this kind of information more carefully.

Which member of staff should I talk to if I have a question about my personal information?

If you have any questions about this notice or about your rights under data protection law, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

What personal information do we collect about you when you apply for and become one of our pupils?

Admissions: We will collect personal information from you and your previous school when you apply to become a pupil at our School. This will be: name, address, contact details, date of birth, information about your family and emergency contacts, the languages you speak, information about your school history and attendance, information that we get from your previous school, information we need for safeguarding pupils, details of academic achievement and exam results, dietary requirements, behavioural information, how you travel to school, and any other information you, your parents, local authorities and solicitors give us.

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

During your time as a pupil: We will collect and put together additional information about you during your time at our School. This will be: absence information,

information on academic achievement classwork/homework/display work, pastoral care information (which means personal information you disclose to us about your health and well being), assessment and exam grades, School reports, notes that your teachers make about your performance and well being, the classes you are in, your 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 your allergies), signing in/out forms, how you use our printers, the programs you use on our computers, the websites you have accessed on our computers, photos, passport information, visas for School trips and notes taken during parents evenings or meetings with your teachers.

We will collect and put together sensitive or special categories of personal information about you during your 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 your 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 you on our CCTV systems.

How do we use your personal information?

We will use your personal information to:

- check your details and identity;
- assess whether to admit you as a pupil;
- review your educational history and exam results;
- communicate with you;
- manage and administer your education and learning;
- review your performance;
- make reports and registers and assign you to classes;
- make arrangements for exams;
- assist you with or administer applications to colleges and universities for purpose of references;
- consider whether any other special arrangements are needed for you such as making arrangements to accommodate any disability;
- arrange School trips and visits;

- safeguard you, including reporting issues to the local authority or police if we need to;
- provide information about you to other schools when you leave;
- meet your dietary and health requirements;
- administer the permissions given for you to attend trips and participate in activities;
- arrange work experience;
- arrange for you to attend School sports events;
- arrange for you to 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?

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

The School uses your 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 your 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 personal information (where relevant) to meet our obligation. For example, where the School has a concern about your health or wellbeing we may have to report this concern and disclose your information to the relevant authorities such as the police, children services and the Courts.

We will publish your 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 sensitive or special categories of personal information e.g. where we keep allergy information, we do this on the basis that 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 under supervision of the School Nurse.

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

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 our pupils and we don't make decisions using only computer technology.

What about when I leave the School?

When you leave the School and become a member of our alumni network, we will keep some information about you and we will ask you if you 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. If you leave to join a new school, the Local Authority will contact you.

Where requested, we may provide your personal information to the Local Authority, for example where you fail to attend your next school.

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 contract with you (such as taking you on as pupil), or we may not be able to comply with our legal obligations (such as to ensure your health and safety). If you have any concerns about whether you need to provide the personal information, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

How long will we keep your personal information?

We will keep the personal information that we have about you 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 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 period stated above.

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 your parents:** We will provide details of your academic achievement and details of your behaviour with your parents or guardians. The legal ground for this is that it is in our legitimate interest to do this. If you would like further information on our legitimate interests please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.
- **With Examination Boards and Universities/Colleges:** We will provide the personal information that an examination board needs to them where we are entering you into examinations. We will also provide relevant personal information to universities/colleges where you are applying there for the purpose of references. The legal ground for this is that it is in our legitimate interests to do this. If you would like further information on our legitimate interests please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk;
- **With Other Schools:** If you move to a new school we will provide your personal information to that school. The legal ground for this is that it is in our legitimate interests to do this. If you would like 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 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, MyMaths, Literacy Planet, Nessy, Cogmed, Testwise) 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;

- **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 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. If you would like 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 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. If you would like 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 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 personal information in this way is necessary in order for us to comply with our legal obligations;
- **With entities, companies or individuals outside 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 business 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 (i.e. medical information) we will only do so where it is necessary for the management of healthcare or in connection with legal claims. If you would like further information on our

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

Will we transfer your personal information outside the European Economic Area?

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

We will only transfer your 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 your personal information outside the EEA where we have a legal ground for doing so and where we ensure that your 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 your 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.

Should you leave our School to attend one overseas, we may transfer your personal data on the basis that you have consented for us to do so, or your parents if you are under the age of 13.

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

Your rights over your personal information

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used. This ICO is this country's regulator of data protection laws and they will be able to give you guidance about your complaint – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- where our use of your personal information is based on your consent, the right to withdraw your consent at any time. To do so, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk;

- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right to ask us to review and explain our legitimate interests to you;
- the right to ask us to delete your personal information where: (i) our processing of your personal information is based on consent, you withdraw that consent and we have no other legal basis to use your personal information; (ii) we don't need your personal information anymore; (iii) you have asked us to review and explain our legitimate interests to you and we don't actually have a valid legitimate interest to do what we are doing; (iv) our use of your personal information is illegal; (v) we have to delete your personal information to comply with our legal obligations;
- the right to ask us to restrict the use that we are making of your personal information where: (i) you don't think the personal information we have about you is correct, so that we can check if it is correct; (ii) what we are doing with your personal information is illegal but you would rather we stop using your personal information rather than delete it; (iii) we don't need your personal information anymore, but you 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 to you, so that we can check whether we actually have a valid legitimate interest to do what we are doing; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly used, machine readable format.

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.