



Privacy Notice for Partnership Schools Pupils and Parents

Author/reviewer responsible:	Operations and Compliance Manager	Date of last review:	04/25
Reviewed by:	DH, P&PB	Date of authorisation:	04/25
Authorised by resolution of:	Full Governing Body	Date of next review:	06/26
Applicable	SPJ & SPS		

This privacy notice is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made to policyquery@stpaulsschool.org.uk

This privacy notice describes how we collect and use personal information about pupils from partnership schools, 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.

This notice applies to all pupils (and parents of pupils) of partnership schools who participate in St Paul's School partnership activities and initiatives.

Who Collects This Information

St Paul's School is a "data controller" of personal data and gathers and uses certain information about pupils and parents. This means that we are responsible for deciding how we hold and use personal information about pupils and parents. Under data protection legislation, we are required to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

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

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

- Personal information such as name, pupil number, date of birth, gender and address and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as language, and free School meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Images or recordings of pupils engaging in School activities, and images captured by the School's CCTV system;
- Information about asylum seeker/refugee status, local authority care or children of service personnel.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs
- Information about your health, including any medical conditions, disabilities and sickness records.
- Information about your gender identity and sex;
- Special educational needs information.

How We Collect this Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. 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 relationship with us.

How and Why We Use Your Personal Information

We will only use your personal information when the law allows us to do so. Most commonly, we will hold pupil data and use it for:

- Providing education services and extra-curricular activities to partnership pupils via our partnership programmes.
- Informing decisions such as the funding of programmes;
- Assessing performance and to set targets for Schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Managing internal policy and procedure;
- To carry out statistical analysis for diversity purposes;
- To carry out monitoring and evaluation of the impact of our initiatives and equality of opportunities;
- 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 intervene or assist with incidents as appropriate;
- Making use of photographic images of pupils in School publications, on the School website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the School's partnerships purposes, including to obtain appropriate professional advice and insurance for the School.

The Lawful Bases 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

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.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, disabilities or sexual orientation require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations in line with our data protection policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring.
- Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

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 partnership pupil information with:

- Partnership Schools that pupils attend/will attend;
- NHS;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors such as lawyers and consultants;
- Support services (including insurance, IT support, information security);
- Providers of learning software such as Colet Mentoring;
- The provider of the database which we use to safely store your data, The Higher Education Access Tracker (HEAT), acting as joint data controller (please refer to the [HEAT Data Protection Policy and Privacy Notice](#), and the [Higher Education Statistics Agency notice to individuals](#) which should be read in conjunction with this privacy notice);
- Providers of equality of opportunity tracking services (e.g. HEAT Core Service) to provide collaborative targeting, monitoring and evaluation of the Schools partnership work in support of its work around equality of opportunity, acting as joint data controller (please refer to the [HEAT Data Protection Policy and Privacy Notice](#), and the [Higher Education Statistics Agency notice to individuals](#) which should be read in conjunction with this privacy notice);
- Other organisations participating in opportunity tracking services for the same purposes of promoting opportunity of equality;
- The Local Authority.

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.

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.

Partnership 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](#).

Where data is shared with the HEAT Core Service, on termination of that Agreement between the School and the provider, your personal data may be transferred to one or more permitted recipients, their successors or assignees. Please see further information at <https://www.hesa.ac.uk/about/regulation/data-protection/notices#linkg> and the Co-ordinating Institution's [HEAT Data Protection Policy and Privacy Notice](#) which explains how your data may be retained.

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). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. The School keeps information about partnership pupils on computer systems and sometimes on paper.

You can find further details of our security procedures within our [Data Breach Policy](#).

Your Rights of Access, Correction, Erasure and Restriction

Under certain circumstances, by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.

- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact [The Operations and Compliance Manager](#) in writing.

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).

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, subject to the provisions relating to research into equality of opportunity tracking and monitoring in the [HEAT Data Protection Policy and Privacy Notice](#), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [The Operations and Compliance 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 [The Operations and Compliance 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 The Operations and Compliance Manager, then you can contact the DPO on the details below:

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

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.