



Churchdown School Academy

ACHIEVING SUCCESS FOR ALL

Privacy notice for students

Introduction

This notice is to help you understand **how** and **why** we collect your personal data and **what** we do with that information. It also explains the decisions that you can make about your own information. If you have any questions about this notice please talk to the school Data Protection Officer or ask your form tutor to speak to her on your behalf.

What is "personal data"?

Personal data is data (information) that the School holds about you and which identifies you. This includes information such as your name, date of birth and address as well as things like exam results, medical details, unique pupil number, attendance and behaviour records. We also hold information such as your religion, your ethnic group, which languages you speak and how you travel to school. CCTV, photos and video recordings of you are also personal data.

Why do we need your personal data?

We need this information in order to educate you and deliver the curriculum to you. This information is also used for your security and protection whilst under the care of Churchdown School Academy. Churchdown School Academy is known as the 'Controller' of the personal data you provide to us.

We have many lawful reasons for collecting your personal data.

Performance of a task carried out in the public interest (PI)

Our primary reason for collecting and processing your personal data is to provide you with an education, keep you safe and promote your welfare. We also need to facilitate the efficient running of the school and ensure that we comply with all of our legal obligations. This is performance of a task carried out in the public interest.

Legal obligation (LO)

The School might need to use your information in order to comply with a legal obligation, e.g. to report a concern about your wellbeing to Children's Services. We will also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests (VI)

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legitimate interests (LI)

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests. We

won't rely on this basis when your interests and fundamental rights override our legitimate interests.

We have a legitimate interest in using your information to:

- i. promote the School including fundraising and publicity;
- ii. preserve historical school records.

The School must also comply with an additional condition where it processes special categories of personal data. These special categories include: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest (SPI)

The School is allowed to use special categories of personal data where doing so is necessary in the substantial public interest. This is similar to "public interest" as listed above. An example would be where the School uses information about your health to look after you. We may also use other types of special category personal data about you to provide you with an education, to look after you and your classmates or when the School is inspected

Social protection and social security law (ESP)

There will be times when the School needs to use your information because we are an employer, e.g. we employ your teachers. Also the School will use your information to comply with social protection law, e.g. to look after you, and social security laws, e.g. to provide you with free school lunches if you are entitled to these. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

Legal claims (LC)

We are allowed to use your information if this is necessary in relation to legal claims, e.g. this allows us to share information with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

Medical purposes (MP)

This includes medical treatment and the management of healthcare services.

How does Churchdown School Academy collect and use personal information?

We collect your personal data on Admissions forms and we collect your personal data from you, your parents or carers, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you. Sometimes we get information from your doctors and other professionals where we need this to look after you.

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. The School's primary reason for using your personal information is to provide you with an education - **LO**, **PI**, **SPI**.
2. The School will also use your personal information to safeguard and promote your welfare and the welfare of others, e.g. so that we can look after you if you are hurt - **LO**, **PI**, **SPI**, **ESP**, **MP**.

3. We will use information about you during the admissions process when taking personal data about you from your parents and your previous school before you join our school. We may let your old school know if you have been offered a place at the School - LO, PI, SPI.
4. We need to tell the appropriate teachers if you have a health issue - LO, PI, SPI.
5. If we have information that you suffer from an allergy we will use this personal data so that we can look after you - PI, SPI, VI, MP.
6. We will need to tell your teachers if you have special educational needs or need extra help with some tasks - LO, PI, SPI.
7. We will need to share personal data about you (e.g. about your health and wellbeing) with the school nurse or school counsellor - LO, PI, SPI, ESP, MP.
8. If we have personal data that you suffer from a disability we will use personal data about that disability to provide support - PI, SPI, ESP and MP in certain circumstances.
9. Where appropriate, the School will have personal data about your religious beliefs and practices, e.g if you do not eat certain foods - LO, PI, SPI.
10. We use CCTV to make sure the School site is safe. - LO, PI, SPI.
11. We will be told if you are eligible for free school meals so that we can provide these - LO, PI, SPI.
12. We record your attendance and if you have time away from the School we record the reason(s) why - LO, PI, SPI.
13. We will need to report some of your personal data to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the School, if you leave the School or let them know if we have any concerns about your welfare - LO, PI, SPI, ESP.
14. We are legally required to provide the Department for Education with certain personal data about you and your classmates. Some of this personal data will be stored on the National Pupil Database. Organisations can request personal data from the National Pupil Database which includes personal data about you. But they are only allowed to do this for limited purposes and they must be very careful about how they use your personal data. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, PI, SPI
15. We may need to share personal data about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School - LO, PI, SPI.
16. We will need personal data about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the School - LO, PI, SPI.
17. Depending on where you will go when you leave us we will provide your personal data to other schools, colleges, universities, UCAS or potential employers, e.g. we will share information about your exam results and provide references - LO, PI, SPI.
18. We may pass on personal data to your next school which they need to look after you, e.g. information about any concerns we have had about your welfare - LO, PI, SPI, ESP.
19. When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards, e.g. if you require extra time in your exams - LO, PI, SPI.

20. The Learning Records Service (which is part of the government) will give us your unique learning number. We may receive details about you (e.g. your qualifications) from the Learning Records Service - **LO, PI, SPI, ESP.**]
 21. We will provide your personal data to the local authority so that they can provide careers advice. We may also share your personal data with the provider of youth support services - **LO, PI, SPI.**]
 22. We sometimes use third parties to offer students the best learning experience and we will share some of your personal data with those third parties. Please see 'Third Parties' after point 37 for more details. **PI, LI**
 23. The School is sometimes inspected to make sure that we are continuing to be a good school. We will have to make your personal data available to the inspectors to help them to carry out their job - **LO, PI, SPI.**
 24. If someone makes a complaint about how the School has behaved we may need to use your personal data to deal with this appropriately, e.g. if your parents complain that we have not looked after you properly - **LO, PI, SPI.**
 25. We may need to share personal data about you with the police or our legal advisers if something goes wrong or to help with an enquiry, e.g. if one of your classmates is injured at the School or if there is a burglary - **LO, PI, SPI, LC.**
 26. We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your personal data with them if this is relevant to their work - **LO, PI, SPI.**
 27. If you have misbehaved in a serious way, we may need to share personal data with the police and we may need to use information about the action taken by the police - **LO, PI, SPI, ESP.**
 28. We may share some personal data with our insurance company to make sure that we have the insurance cover that we need - **LO, PI, SPI, LC.**
 29. We may use your personal data when responding to an incident, e.g. if something is published on social media which concerns the School - **PI, LI.**
 30. We will share your academic and your behaviour records with your parents or carers so they can support your schooling - **LO, PI, SPI, ESP.**
 31. We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This monitoring is sometimes carried out using computer software. In certain circumstances we will look at the content of your communications (e.g. emails and text messages). We monitor and look at your use of technology (e.g. your use of your phone) to check that you and your classmates are not misbehaving, at risk of harm or for other good reasons. If you would like more information about this you can speak to the IT Manager or your form tutor - **LO, PI, SPI.**
 32. We may use personal data about you if we need this for historical purposes, e.g. if we consider the information might be useful if someone wanted to write a book about the School - **LI.**
 33. We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School - **LI.**
 34. Sometimes we use photographs and videos for teaching purposes, e.g. to record a drama lesson or as part of an art lesson - **LI.**
- If you have concerns about us using photographs or videos of you please speak to your form tutor.

35. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - **LI**.
36. We may keep details of your address when you leave so we can send you copies of the school newsletter or to send you details of any school alumni events - **LI**.
37. The School must make sure that our computer network is working well and is secure. This may involve personal data about you, e.g. our anti-virus software might scan files containing information about you - **LO, PI, SP**.

Third Parties

We will only share your personal data with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

We sometimes use third parties to offer students the best learning experience and we will share some of your personal data with those third parties. Our information sheet will keep you fully informed of what data is shared with each third party, what the data is used for, who the data is shared with and how long the data is kept. If you have any queries about this data sharing please contact the Data Protection Officer on DPO@churchdownschool.com who can also give you information about your data sharing rights.

Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations and to look after our pupils.

More than one basis

As you will see from the information, in some cases we will rely on more than one basis above for a particular use of your personal data. In addition, we may move from one of the legal bases listed above to another as circumstances change, e.g. if we become really worried about your wellbeing, we may start to rely on legal obligation to share your personal data with the local authority in addition to the other legal bases which are noted for looking after you.

Consent

We may ask for your consent to use your personal data in certain ways as an alternative to relying on any of the bases in the table above. We may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on our legitimate interests or it being in the public interest. If we ask for your consent to use your personal data you can take back this consent at any time.

Any use of your personal data before you withdraw your consent remains valid. Please speak to the school Data Protection Officer, or ask your form tutor to speak to her on your behalf, if you would like to withdraw any consent that you have given.

Sending your personal data to other countries

We may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may:

- store your personal data on cloud computer storage based overseas; or

- communicate with you by email when you are overseas (e.g.when you are on holiday)].

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm If the country that we are sending your personal data to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal data as there is in the UK.

In this instance we would ensure that appropriate safeguards are in place in accordance with GDPR recommendations.

For how long do we keep your personal data?

We keep your personal data for as long as we need to in order to educate and look after you. We will keep some personal data after you have left the School, e.g.so that we can find out what happened if you make a complaint. Normally we will keep your personal data until you are 25 years old however some of your data may not be kept as long as this.

In exceptional circumstances we may keep your personal data for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please ask for a copy of our Retention of Records Policy for more detailed information.

What decisions can you make about your personal data?

You can make various decisions about your personal data. Your rights are as follows:

- **Rectification:** if personal data is incorrect you can ask us to correct it.
- **Access:** you can also ask what personal data we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the personal data that we hold about you in certain circumstances, e.g. where we no longer need the personal data.
- **Portability:** you can request the transfer of your personal data to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of personal data about you may be restricted to simply storing it in some cases, e.g.if you tell us that the personal data is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your personal data where:
 - we are using it for direct marketing purposes (e.g. to send you the School newsletter);
 - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your personal data" above; and
 - we are using it for historical or scientific research purposes or archiving purposes e.g. we may keep photographs of your class for historical reasons.

The school Data Protection Officer can give you more information about your data protection rights.

Further information and guidance

This notice is to explain how we look after your personal data. The school Data Protection Officer can answer any questions which you might have.

Please speak to the school Data Protection Officer or ask your form tutor to speak to them on your behalf, if:

- you would like to exercise any of your rights listed above; or
- you would like us to update the personal data we hold about you; or
- you would prefer that certain personal data is kept confidential.

The school Data Protection Officer, Ms Brooks-Hughes, can be contacted by email on DPO@churchdownschool.com or by telephone on 01452 713340. The Data Protection Officer monitors and advises on the School's data protection compliance.

You can ask your form tutor to speak to the Data Protection Officer or speak to the Data Protection Officer yourself. Alternatively, you can ask your parents or carers to speak to us on your behalf if you prefer.

If you consider that we have not acted properly when using your personal personal data you can contact the Information Commissioner's Office: ico.org.uk.