

PRIVACY NOTICE – PARENTS AND CARERS

ISI Reference:	
Rationale for the Policy:	This policy is created to ensure that The Grammar School at Leeds, GSAL Transport Ltd, and GSAL Enterprises (together GSAL) meets its data protection obligations, including those provided for in data protection legislation, whilst adhering to statutory requirements already extant within the education sector.
Policy aim:	To fulfil the transparency principle under the GDPR to inform parents/carers of the data processing activities undertaken at GSAL.
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Agreed and Authorised by:	GSAL SLT
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**The School runs on FREDIE principles:
Fairness, Respect, Equality, Diversity, Inclusion and Engagement**

1. General principles

- 1.1 The Grammar School at Leeds ("GSAL", "the school") is a data controller with registered address at Alwoodley Gates, Harrogate Road, Leeds, LS17 8GS and is committed to ensuring that the personal data of all pupils and their parents/carers is handled in accordance with the principles set out in the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
- 1.2 GSAL will process information in accordance with its own Data Protection Policy and Data Retention Schedule. To comply with the law, data must be collected and used fairly, stored safely and securely, be adequate, relevant and not excessive, be kept accurate and up to date, held only as long as necessary and not disclosed to any third party unlawfully.
- 1.3 This policy applies to prospective, current and former parents and carers.
- 1.4 This policy describes the categories of personal data that we collect, how we use and secure your personal data, and when we may disclose your personal data to third parties. It also describes your rights regarding your personal data and how you can access, correct, and request erasure of your data.

2. What information do we hold?

- 2.1 Personal data are normally initially provided to the school by a prospective pupil and their parents/carers from the point of enquiry, and subsequently on an online or paper-based application form and is added to over the course of their time at the school.
- 2.2 We may collect, store, and process the following categories of personal data about you:
 - 2.2.1 personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
 - 2.2.2 date of birth and gender;
 - 2.2.3 details of the occupation and place of work of parents/carers/guardians;
 - 2.2.4 equal opportunities monitoring information (including racial or ethnic origin, religious beliefs, disabilities, sexual orientation, criminal convictions and offences);
 - 2.2.5 emergency contact information and details about parents/carers/guardians;
 - 2.2.6 copies of identification and pupil ID photos;
 - 2.2.7 parental bank account details;
 - 2.2.8 parental wage and benefits information when parents apply for a bursary;
 - 2.2.9 parental financial information including around the payment of fees, debts and late payments;
 - 2.2.10 data relating to academic performance (such as exam result data; internal assessment data; school reports; individual needs assessments and reports; etc.);
 - 2.2.11 photographic images, CCTV footage, video and audio recordings;
 - 2.2.12 health and medical information;
 - 2.2.13 dietary information;
 - 2.2.14 attendance information;
 - 2.2.15 disciplinary records;
 - 2.2.16 safeguarding information (including user ID, device ID, date, time and screenshot of a pupil's screen at the moment an incident occurred using school provided electronic devices, e.g. details of attempts to access potentially illegal content);
 - 2.2.17 pastoral information;
 - 2.2.18 information about other schools the pupil attended before and after GSAL;
 - 2.2.19 information collected when the pupil ID card is scanned (time, date and location of door or charging point);
 - 2.2.20 other personal details included in an application form, or other information that you otherwise voluntarily provide to us;
 - 2.2.21 information relating to family, lifestyle and social circumstance;
 - 2.2.22 details of any extra curriculum activities the pupil would like to undertake i.e. music lessons.

3. How is personal data collected?

- 3.1 Generally, the school receives personal data from the individual directly, or in the case of pupils from their parents, guardians or carers. This may be via a form, or simply in the ordinary course of interaction or communication, such as email or written assessment.
- 3.2 In some cases personal data may be supplied by third parties e.g. referees, previous schools, authorities working with that individual or collected from publicly available resources.

4. Why do we process personal data?

- 4.1 In order to carry out its ordinary duties to pupils and parents, the school may process a wide range of personal data about individuals (including current, past and prospective pupils or parents) as part of its daily operation.
- 4.2 Some of the activity the school will need to carry out in order to fulfil its legal rights, duties or obligations, including those under the parent contract, include:
 - 4.2.1 managing pupil application and recruitment processes (including bursary applications);
 - 4.2.2 managing attendance and monitoring school activities and participation;
 - 4.2.3 managing and monitoring academic provision and outcomes (including individual pupil progress; overall school monitoring processes; examination results; pupil reports; etc.);
 - 4.2.4 pupil photographs are used on the school intranet system, catering and transport systems and SIMS for the purposes of identification and security. The school may occasionally commission photographs or video images around school at specific school events or on the school's social media and web platforms;
 - 4.2.5 monitoring computing use to ensure adherence to the Pupil Acceptable Use Policy;
 - 4.2.6 provision of pastoral and safeguarding services to pupils (including pupil health and medical provision);
 - 4.2.7 monitoring pupil activity in the digital environment provided by the school, in order to detect and alert markers of risk to safety, welfare and wellbeing;
 - 4.2.8 compliance with legal and statutory obligations such as for school inspections and information provided to the DfE;
 - 4.2.9 responding to and defending legal claims;
 - 4.2.10 The provision of educational services and support and associated services to pupils and parents, including musical education, library services, career services, access to the IT systems and virtual learning environment (VLE), the administration of sports teams and fixtures, school trips and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs.
- 4.3 Other use of personal data will be made in accordance with the school's legitimate interests, or the legitimate interest of another, provided that these are not outweighed by the impact on individuals. The school expects that the following uses may fall within its legitimate interests:
 - 4.3.1 to carry out our activities and obligations as a school and to fulfil our pupil recruitment processes;
 - 4.3.2 providing communications about GSAL news and events, such as through GSAL World;
 - 4.3.3 publicising and celebrating individual and school achievements, both internally and externally;
 - 4.3.4 maintaining relationships with alumni and the school community, including direct marketing or fundraising activity; and maintaining the school archive (see also Alumni Privacy Notice);

- 4.3.5 for the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- 4.3.6 for security purposes, including CCTV.
- 4.3.7 for the purpose of maintaining communications and relationships between parents and carers, and the school, including through the PFA, about school and PFA activities and events. The lawful basis for sharing will be to support the legitimate interests of the school.

4.4 Collection and use of special categories of personal data

We may collect and process special categories of personal data where it is necessary for the purposes of performing or exercising our obligations or rights and industry obligations, for health purposes, in relation to equal opportunity treatment, for the identification and celebration of achievements within a targeted demographic (based only on explicit consent), and for preventing or detecting unlawful acts. Such special categories of personal data may include:

- 4.4.1 Information about pupil's racial and ethnic origin; sexual orientation; religion, beliefs and disability information to ensure meaningful equal opportunity monitoring and reporting;
- 4.4.2 physical or mental health data or disability status to ensure safety in the school environment, provide appropriate adjustments and to make decisions regarding school provision and ability to meet needs;
- 4.4.3 political opinions where there is a suspicion that those opinions may be extreme or concerning;
- 4.4.4 segregation of school databases for the purposes of monitoring and (with explicit consent) disclosure to the media;
- 4.4.5 managing a safe environment and determining appropriate provision for pupil health and wellbeing needs.

5. **Who has access to your data?**

- 5.1 Your personal data will be stored securely and may be accessed by staff who legitimately need the information to carry out their duties, including those in finance, computer services, pastoral teams and the academic staff. The amount of personal information shared within GSAL will be no more than is reasonably necessary.
- 5.2 The school shares pupil and parent/carers data with third parties where this is necessary to facilitate and/or promote school operations or to fulfil our legal obligations, or in pursuit of our legitimate interests or those of third parties. Examples include (but are not limited to):
 - 5.2.1 the running of clubs and school events/fixtures (examples may include the MOD, other schools, the scouts or girl guides associations, orchestras);
 - 5.2.2 operating the school's management information systems (examples may include providers of IT services);
 - 5.2.3 providing education services (examples may include IT systems, hosted databases, web developers or cloud storage providers);
 - 5.2.4 managing behaviour (examples may include sharing information about behaviour with parents);
 - 5.2.5 organising trips and visits (examples may include travel companies, tour operators, airlines, attractions etc.);
 - 5.2.6 promoting the school and the pupils within it (examples may include the media and social media, magazines, advertisements etc.);
 - 5.2.7 examination and competition entries (examples may include examination awarding bodies or competition judges);
 - 5.2.8 we may share your personal data with solicitors for the purpose of legal claims;
 - 5.2.9 higher education and work experience facilitation (examples may include employers, universities and colleges);
 - 5.2.10 we may share information about you with other education providers where they ask us for a reference;

- 5.2.11 ensuring the safeguarding of pupils (examples may include the local authority, social and health services, the health and safety executive, the emergency services, courts, our professional advisors, insurance companies etc.);
- 5.2.12 official and government agencies (examples may include the Department or Education, HMRC, school inspectors or auditors etc.); and
- 5.2.13 provision of catering and transport services.

5.3 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 which are held securely on the school's information management system and accessed by staff with the appropriate permissions, or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

5.4 Staff, 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 Local Area Designated Officer (LADO) or police. For further information about this, please view the school's Safeguarding Policy.

6. Do we transfer your personal data to other countries?

We may transfer your data outside of the UK, for example when a software provider is located outside of the UK or for international trips. In such cases the school will ensure that appropriate safeguards are in place (such as the use of standard contractual clauses provided by the European Commission for such purposes or adequacy decisions) along with information about those safeguards.

7. How does the school protect your personal data?

- 7.1 The school takes the security of your data seriously. Internal policies and controls have been put in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.
- 7.2 Where the school engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

8. For how long does the organisation keep data?

Information about pupils and their parents/carers is retained only for as long as it is necessary to fulfil the purposes it was collected for and is disposed of in accordance with the school's Data Retention Schedule. Generally, for pupil records this will be until the student turns 25 in line with best practice guidelines. For more information on how long we retain your personal data you may request a copy of our Retention Schedule.

9. Your rights

The GDPR has provided for data subject rights which include:

- 9.1 **Right of Access** – You have the right of access to information we hold about you. We have up to one month to provide you with the information and at no cost to you. We will provide you with a copy of the information we hold that relates to you. For more information, please see our Data Subject Access Right Policy and Procedure.

- 9.2 **Right to rectification** – You have the right to have inaccurate information about you rectified, or incomplete personal data to be completed.
- 9.3 **Right to Restriction of processing** – you have the right to request that we refrain from processing your data where you contest its accuracy, the processing is unlawful, where we no longer need the data but you require us to keep it for legal purposes or where we are considering any legitimate interest we may have for processing your personal data.
- 9.4 **Right to object** – you have a right to object to our processing of your personal data where the basis of the processing is our legitimate interests
- 9.5 **Right to data portability** - you have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent or performance of a contract and is carried out by automated means. This is called a data portability request.
- 9.6 **Rights related to automated decision-making, including profiling** – you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
- 9.7 If you would like to exercise any of these rights, please contact the school's Data Manager at datamanager@gsal.org.uk (or by post to Data Manager, Grammar School at Leeds, Alwoodley Gates, Harrogate Road, Leeds, LS17 8GS).
- 9.8 More information about your data protection rights can be found on the Information Commissioner's Office (ICO) website (see link below). You also have a right to lodge a complaint about any aspect of how we are handling your data. You can do this by contacting the ICO at the address below.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
0303 123 1113 | www.ico.org.uk

10. **Automated decision making and profiling**

We do not make any decisions about you using automated means and we do not envisage this changing in the near future. If the situation does change, we will notify you in writing.

11. **Withdrawing consent**

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact datamanager@gsal.org.uk

12. **What if you do not wish to provide personal data?**

- 12.1 The school may require you to provide data in order to fulfil its contractual or legal obligations, or in order to provide suitable care for pupils. Failing to provide the data may mean that the school is unable to fulfil these requirements, which may lead to pupil exclusion from specific events or elements of provision, or else more generally.
- 12.2 Certain information, such as contact details, employment details, have to be provided to enable the school to effectively administer pupil applications. If you do not provide this information, the school will not be able to progress an application to attend GSAL.

13. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. Any significant changes to the terms will be published on the school's website and you will be notified of such changes. For full details of how data and privacy are managed by the school, please visit: www.gsal.org.uk/about/school-policies