



Data Protection Policy

Parents and Students

The EU General Data Protection Regulation (GDPR)

Date	Review Date	Coordinator	Nominated Governor
01/09/2020	01/09/2021	A Goodwin	Greg Wilson

On the 25th May 2018 the General Data Protection Regulation (GDPR) will be applicable and the current Data Protection Act (DPA) will be updated by a new Act giving effect to its provisions. Before that time the DPA will continue to apply.

Data Controller

St David's College complies with the GDPR and is registered as a 'Data Controller' with the Information Commissioner's Office (Reg. No. Z7540089).

The Data Protection Officer (DPO) for the school is Mr A Goodwin.

We ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

Rights

The GDPR provides the following rights for Individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

- See the ICO website for more details <https://ico.org.uk>

Collecting and using pupil Information?

We collect and use pupil information under the principle of the General Data Protection Regulations (GDPR) which states that data is used for "specified, explicit and legitimate purposes". We use pupil data to:

- Process admission and registration
- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Assess the quality of our services
- Comply with the law regarding data sharing
- The prevention and detection of crime

- Protecting vulnerable individuals
- Process any complaints

Pupil information which we collect, hold and share include:

- Personal information (i.e. name, unique pupil number and address)
- Characteristics (i.e. ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (i.e. sessions attended, number of absences and absence reasons)
- National curriculum assessment results
- Special educational needs information
- Relevant medical information

Processing Information

We process pupil information in order to “exercise the official authority vested in us” to deliver education to your child. Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with GDPR we will inform you when your consent is required, for example in respect of racial or ethnic origin, religion, or where we intend to use photographs or biometric finger prints.

Storing pupil data

We hold pupil data until your child reaches 25 years or for the duration of the criteria which underpin the statutory regulation. After this point the data will be anonymised in line with best practices and used only for statistical and research purposes or erased entirely. With permission or request, personal data will be stored for students who become a member of the Old Davideans’ Association (ODA). This will include; name, address, Telephone number, email address. Information will be accessible by the Headmaster and Headmaster’s secretary for the purpose of informing parents and students of the ODA. Personal information is not shared with the ODA. Refer to the ODA data privacy policy for details on how they collect and transfer data.

Communication and our school community

In order to establish effective communication and partnership with parents and our school community we aim to provide an open and communicative environment forming a link between the classroom and the home, and the school and the family.

Our methods of communication include:

Letters
Texts
Phone Call
Email

We also use the following social media sites:

Twitter
Facebook
WhatsApp
Instagram

Admissions

As part of the registration and admissions process, personal and sensitive data will be collected. Information is retained for a maximum period of 6 months. For those who do not take up their place at St David's College but register further interest for the future, email addresses will be added to the emailing list within admissions and marketing and kept for a period of 3 years. Parents who wish to remove details should follow our guidance on 'rights for erasure'.

Photographs

The School may use/take photographs, videos or webcam recordings of pupils or students for official educational purposes.

- Admission/Application
- MIS system,
- Lesson observations/monitoring
- Other internal educational purposes
- Safety / pupil & School protection (CCTV)

Photographs may also be taken for external purposes that may be viewed by the general public. These include:

- Ceremonies
- Newspaper articles
- Marketing brochures
- Website articles
- School Twitter Page
- School Snapchat
- Official School Facebook account

If you do not wish to have photographs/ videos taken of yourself (student) or of your child (Parent) that may be viewed by the general public please ensure that the appropriate box has been ticked on our data protection compliance form.

On leaving the school, photographs and videos may be used for marketing purposes unless a 'right of erasure form' is completed.

Biometrics

The school operates biometric recognition systems (fingerprinting) to allow entry into some areas of the school

All data collected will be processed in accordance with the GDPR Data Protection Principles and the Protection of Freedoms Act 2012

The consent of at least one parent will be obtained before biometric data is taken and used. If one parent objects in writing, then the school will not take or use a child's biometric data.

For more information about biometric data please refer to the ICO Guidance.

Sharing Information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We routinely and/or occasionally share pupil information with:

- Estyn
- NHS (vaccinations/school nursing service)
- Progresso Management system
- Police, Fire, Rescue, Ambulance services
- Social Services
- CAMHS
- Other schools/academies/MATs (during pupil transfer)
- Examination boards (JCQ – access arrangements online, Edexcel, Cambridge, OCR, WJEC, AQA.)
- Offsite learning providers
- Residential trip organisers (and insurers)
- Bentley Photographic (school photographers)
- Sixth form colleges & other post-16 providers
- Medical centre

AGED 14+ QUALIFICATIONS

For pupils enrolling for post-14 qualifications, the Learning Records Service will give us a pupil's unique learner number (ULN) and may also give us details about the pupil's learning or qualifications.

Requesting access to your personal data

Under GDPR, parents/guardians and pupils have the right to request access to information about them, which we hold. To make a request for your personal information, or be given access to your child's educational record, please email or write a letter containing a description of the request to the Headmaster, Mr. Andrew Russell. Requests will be processed within one month with the exception of circumstances where the volume of retrieval is high or unexpected circumstances prevent retrieval. See the ICO website www.ico.org.uk for more information about individual rights.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means

- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Claim compensation for damages caused by a breach of the Data Protection Regulations

Security Measures

How do we look after your personal data and keep it safe?

Access to your personal data will be limited to school staff who need to know about you.

Information held on paper files are securely stored at the school and information stored on computer will be held securely behind passwords and other measures.

Information held on electronic files may also be stored for the school on 'cloud-based' servers providing that we are satisfied that our personal data will be held securely and protected from any unauthorised access.

We work in conjunction with our IT partners to ensure that computers and servers comply with all up to date Government regulations and are secure with:

- anti-virus software
- fire wall software
- passwords

All school personnel are trained to:

- be discreet and confidential
- consider the safe and secure positioning of computers
- back up data
- turn off computers when not in use
- remember password access
- lock filing cabinets and doors to offices
- shred confidential material
- clear their desk before they leave school

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the School Handbook/Prospectus
- the school website
- the Staff Handbook
- meetings with parents such as introductory, transition, parent-teacher consultations and periodic curriculum workshops
- school events

- meetings with school personnel
- communications with home such as weekly newsletters and of end of half term newsletters
- reports, such as annual report to parents and Headmaster's reports to the Governing Body
- information displays in the main school entrance

Role of School Personnel

School personnel will:

- comply with all aspects of this policy
- be aware of all other linked policies
- follow the safe and confidential system procedures that are in place to protect personal data and pupil records
- check this data and will inform the Data Controller of any mistakes
- apply in writing for access to their personal data
- comply and respect confidentiality of personal information at all times but especially when involved with interviewing new school personnel
- provide accurate and up to date personal information
- inform the school of any changes to their personal data
- report and deal with all incidents of discrimination
- attend appropriate training sessions on equality
- report all data breaches to the Data protection Officer
- report any concerns they have on any aspect of the school community

Grievance Procedure

Any member of the school personnel who disputes any aspect of their personal data with the Data Controller has the right to take up the matter under the school's formal grievance procedures.

Right to Erasure

You have the right to request the deletion of your data where there is no compelling reason for its continued use. See 'collecting and using data' for details on legal duty. Parents should fill a 'Right to Erasure' request form and send it to the Headmaster, Mr Andrew Russell. A verbal request may be made directly to the Headmaster. A meeting with the headmaster may be required in order to support the request. Where pupils have made a request, parents will be informed followed by a meeting with the Headmaster. The school will ensure that all data requests are completed within one month.

Concerns and Contact Information

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact: If you would like to discuss anything in this privacy notice, please contact:

Andrew Goodwin, Chief Protection Officer

agoodwin@stdavidscollege.co.uk

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.