

STAHS Privacy Notice

STAHS is committed to ensuring that your privacy is protected. STAHS is a company limited by guarantee with company registration number 00321911 and a registered charity with charity registration number 311065. We are registered as a data controller with the Information Commissioner's Office under registration number Z8481995.

This Privacy Notice provides detailed information about how and why we use (or "process") personal data and what we do with that information. It also explains the decisions that you can make about your own information. Data protection legislation gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the school's obligations to its entire community. Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice.

Please read it carefully, and if you have any questions regarding your personal data or its use, please contact us at info@stahs.org.uk; or by telephone on 01727 853800.

The school has appointed the Data Compliance Officer as the individual with responsibility for dealing with requests and enquiries concerning the school's uses of personal data and he/she will endeavour to ensure that all personal data is processed in accordance with this Privacy Notice and data protection legislation.

Types of personal data we process

We process personal data about prospective, current and past pupils and their parents (including all those with parental responsibility); staff, suppliers and contractors; donors, supporters and other individuals connected to or visiting the school.

Personal information is information that identifies you as an individual – it may be factual information, images or other recorded information.

Examples include:

- Names, addresses, telephone numbers, email addresses and other contact details;
- Family details;
- Admissions, academic, disciplinary and other education related records, information about special educational needs, references, exam scripts and marks;
- Images, audio and video recordings;

- Financial information and bank details (eg for bursary assessment, for fundraising, or about parents who pay fees to the school);
- Courses, meetings or events attended;
- Demographic information such as post code, preferences and interests;
- Where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- References given or received by the school about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- Correspondence with and concerning staff, pupils and parents past and present; and
- Personnel files, including in connection with academics, employment or safeguarding
- Other information relevant to maintaining our website and web servers such as IP address, Operating System, Browser.

As a school, we need to process special category personal data (eg concerning health, ethnicity and religion) and criminal record information about some individuals. We do so in accordance with applicable law (including with respect to safeguarding employment) or by explicit consent.

What we do with the information we gather

The school's primary reason for using personal information is to provide educational services to our pupils and we need to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of the day to day running of the school.

We set out below examples of the different ways in which we use personal information and where this data comes from:

- We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local authorities.
- We may have information about any family circumstances which might affect your child's welfare or happiness.
- We may need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the school.
- We use CCTV in some external areas and some internal areas for security purposes. CCTV is not used in private areas such as toilets.
- We may take photographs or videos of you and / or your child at school events, to use in printed prospectuses, on social media and on the school website. This is to showcase the range of opportunities on offer at the school and to celebrate the successes of pupils across the school. Although we endeavour to use only the most recent footage, we may continue to use these photographs and videos after your child has left the school.

- We may send you information to keep you up to date with what is happening at the school. For example, by sending you information about events and activities that may be of interest, such as concerts, parent talks or by sending you the school newsletter.
- We may keep details of your address when your child leaves the school so we can send you information and find out how your child is progressing. We may also pass your details onto our alumni body, the Old Girls' Association.
- We share names and email addresses of pupils' parents/guardians and names and classes/years/houses of pupils with the Chair of the School Parents' Association, which the Parents' Association will use through the Claslist communication system for the purposes of informing parents/guardians about the Parents' Association and School activities, events and news and establishing and maintaining relationships and communication between parents/guardians, the Parents' Association and/or the School. Parents have the choice to either accept or decline their invitation to the Claslist site and are also able to control any personal data they may then choose to share with other parents through the site. Parents who join Claslist are able to unsubscribe from the site at any point. The Parents' Association will further use the personal data above for the purposes of efficiently running the School Second-Hand Uniform Shop. If you do not want us to share personal data relating to you and/or your child(ren) with the Parents' Association, please contact us at info@stahs.org.uk.
- We may use the information to customise the website according to your preferences.

Collecting, handling and sharing personal data

We are committed to ensuring that your information is secure. We collect most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents). In some cases we collect data from third parties (for example referees, previous schools, the Disclosure and Barring Service) or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. We do not transfer personal data outside of the European Economic Area, unless it is lawful to do so under data protection legislation.

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the school of any significant changes to important information, such as contact details, held about them. An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under data protection legislation): please see below for contact details.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as local authorities, examination boards, the school doctors, the school's professional advisors and relevant authorities (eg the Local Children Safeguarding Board, Social Services and NHS Services, UK Visas and Immigration, HM Revenues and Customs, Department for Education and Department for Work and Pensions).

Some of our systems are provided by third parties, eg hosted databases, the school website, School Post and Parent Portal. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

We share parent contact email addresses with external co-curricular providers at the school where pupils/parents have elected to join those activities, to facilitate invoicing and organizational arrangements between the external club leader and parents.

We share personal data about alumnae with the Old Girls' Association ("the OGA"). We do not otherwise share or sell personal data to other organisations for their own purposes.

The lawful basis on which we use this information

This section outlines the legal basis that we are relying on when handling personal data.

Legitimate Interests

The school relies on legitimate interests for most of the ways in which it uses your information. This means we use personal data in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

Specifically, the school expects that the following uses will fall within the school's (or another's) legitimate interests:

- Providing education services to your child;
- For the purposes of pupil selection and our admissions process;
- Safeguarding and promoting the welfare of your child (and other children);
- Promoting the objects and interests of the school. This includes maintaining relationships with alumni and the school community and direct marketing and fundraising activity. The school will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post;
- Facilitating the efficient operation of the school;
- To give and receive information and references;
For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- For security purposes, including CCTV in accordance with the school's CCTV policy;

- To carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- Ensuring that all relevant legal obligations of the school are complied with; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

Legal obligation

Where the school needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may 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

For example to prevent someone from being seriously harmed or killed.

The school must also comply with an additional condition where it processes special categories of personal information or criminal records information. These special categories are: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information and information about sex life or orientation. We will process special category personal data or criminal records information in accordance with rights or duties imposed on us by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with the school's legal obligations and duties of care.

How long we keep personal data

The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the school. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

We will keep some information after your child has left the school, in case of inquiries and for historical, research or statistical purposes. If you have any specific queries about our record retention periods, please contact the Data Compliance Officer. Please bear in mind that the school will often have lawful and necessary reasons to hold on to some personal data even if you ask us to consider it for erasure.

Your rights

Data protection legislation gives you a number of rights regarding your information as follows:

- Where the school is relying on consent as a means to process personal data, you have the right to withdraw consent, where given, or otherwise object to receiving generic or fundraising communications. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been set out under this Privacy Notice (or elsewhere in data protection legislation), or may exist under some form of contract or agreement with the individual (eg an employment or personal contract, or because of membership of one of our associations).
- You can ask what information we hold about you and be provided with a copy. We will also give you extra information such as why we use this information, where it came from and what types of people we have sent it to. You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action). The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.
- You can ask us to delete the information that we hold about you in certain circumstances, for example where we no longer need the information.
- In some cases you can ask us to amend the personal data we hold or have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations. We will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer.

- Our use of information about you may be restricted in some cases, for example if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.

If you would like to access or amend your personal data, or have some other objection to how your personal data is used, please make your request in writing to: the Data Compliance Officer, St Albans High School for Girls, Townsend Avenue, St Albans, AL1 3SJ.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where data protection legislation allows it.

Pupil Data

The rights under data protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to pupils (if – and only if – consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under the Parent Contract, and all the circumstances.

In general, we will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the pupil or other pupils, or is required by law.

Pupils can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. Our pupils are generally assumed to have this level of maturity. A person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils, but the information in question is always considered to be the child's at law. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.

This Policy

Our Privacy Notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including but not limited to the Parent Contract, our Safeguarding Policy, Data

Protection Policy, Health & Safety Policy, Acceptable Use Policies, eSafety and Cyberbullying policy and IT Policies.

We will update this Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on the website and to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with data protection legislation, you should notify the Data Compliance Officer, St Albans High School for Girls, Townsend Avenue, St Albans, AL1 3SJ. You can also make a referral to, or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with us before involving them.

St Albans High School for Girls, Townsend Avenue, St Albans, Hertfordshire AL1 3SJ

Tel: 01727 853800 email: info@stahs.org.uk