



Data Privacy Notice for Parents of Pupils

1. Introduction

- 1.1 Under new data protection regulations we are required to provide you with a clear statement of how any personal data associated with you and your child will be collected, stored and processed by those involved in the provision, support and/or receipt of educational services within Prior Park Schools ('the school'), including teachers, administration and support staff, outside contractors as well as you and your child.
- 1.2 We are also required to provide you with a clear statement regarding who we may need to share your data with and what will then happen to that data once you or your child leaves the school as well as what controls you can reasonably expect to have over this data.
2. This notice will be revised regularly to meet the ongoing needs of the school - you will not have to provide consent for these revisions unless there is a substantial change. We will then ask you for further consent as needed.
- 2.1 You will also receive the Student Acceptable Use of IT Services policy and Data Privacy Notice, which, together with detail how your child will use school IT services and how we will store and process student information. You (and/or your child if over the age of 13) will need to sign this agreement if they are to be able to access our systems.

3. Why we need to store and process personal data about you or your child

We have a legitimate interest in using your or your child's personal data so that we may perform our obligations under our contract with you. This includes our need to:

- provide educational and pastoral services to your child, including the sharing of necessary data with a previous or new school.
- safeguard and promote the welfare of your child and all other student.
- ensure the efficient operation of the school (for example, by communicating with you or your child by email, phone or text).
- ensure that all statutory /legal obligations of the school are complied with (including the sharing of personal data with outside statutory bodies such as the police and social services).
- enhance and protect the services and interests of the school. For example, this may include marketing, fundraising, and development activities as well being able to enforce our rights regarding payment of school fees. It may also include the use of historical data to track and develop the provision of future educational and pastoral services.

4. What personal data we may store about you or your child and how it may be used

4.1 Personal information is any information that could be used to identify you or your child.

The following is a list of key school processes along with the type of your or your child's personal data you may be asked to provide:

- **Admissions, Academic and Pastoral systems:** name and contact details for teacher/tutor communication, next of kin, ethnicity, religion, medical and/or special educational requirements, audio photographic or video evidence, academic and pastoral records from previous schools, current academic and pastoral records and reports.
- **Financial / Payment Systems:** name and contact details, bank account, other financial records necessary to support the application for bursaries or specific payment circumstances.
- **Communication and Marketing:** name and contact details for weekly news communication and special events. Use of photographs and video of your child in advertising, social media and on the school website.
- **Co-Curricular Activities including school trips, music, drama, sports teams, Combined Cadet Force:** name and contact details for teacher/tutor communication, next of kin, medical requirements, audio photographic or video evidence.
- **IT Services for Students (including logons, work areas, email, wifi and Internet access, external online learning services):** name, files created by the student (which may potentially include photos and video), internet logs, IP and Mac addresses of personal and school internet-connected devices.
- **Building and Security systems:** Video of students captured on external CCTV systems, electronic door access logs.
- **Development and Alumni:** name and contact details of you or your child both during and after their time at Prior Park Schools, access to historical records of the academic and co-curricular activity of current and past pupils.

4.2 Each of these areas may store different aspects of your or your child's personal data and be subject to different statutory regulations regarding the processing and retention of that data.

4.3 Personal data may be stored securely on-site as hard-copy documents and digitally on school-owned servers, or on "cloud"-based services hosted by accredited providers.

4.4 Details of the school policies relevant to these areas can be found at <http://www.priorparkschools.com/school-policies>

5. Who will be able to access that data

5.1 All personal data stored on school managed systems (whether on-site or cloud-based) will only be used according to the legitimate interests of the school (as stated in section 3). Your

data will never be shared with any outside organisation or individuals for any other purpose without your additional consent.

- 5.2 In the interests of transparency and accountability, access to any data stored within school-managed IT systems is via login account(s) unique to the individual identified as being appropriate to processing that data.
- 5.3 The type and level of access to those accounts is strictly set and controlled by school IT administrators as directed by school policy, management and governors.
- 5.4 We are required to ensure that all such personal data is only accessible to the identified members of staff who need to process that data. This is especially true of data defined as “Special Category” data such as health records, ethnicity, and religion. (Further details regarding special category of data can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data>).

6. Our responsibilities in storing your data

- 6.1 All data stored on local school systems resides on servers kept in locked, alarmed locations. Physical access to those locations is controlled by school IT administrators. These systems are backed up daily and we have a “DR” (Disaster Recovery) procedure in place to quickly restore failed or compromised systems.
- 6.2 All data stored on the various cloud-based platforms are owned by Prior Park Schools and located in secure data centres located in the UK and EU, or in data centres subject to EU GDPR requirements.
- 6.3 Any third party service required to manage or support school systems on which personal data is stored and processed will be required to provide written evidence of their own data privacy policies and prove their adherence to UK and EU data protection regulations.
- 6.4 In the event of a data breach that directly compromises any personal data stored on any school-managed IT system or local hard copy repository, the subject(s) of that data will be informed of the potential impact and remedy as soon as an appropriate assessment can be made. This will normally be within 72 hours of the discovery of the breach.

7. What happens to that data when your child leaves Prior Park Schools

- 7.1 Prior Park Schools is committed to only storing and processing any personal data for as long as is required by the specific school process or where there is a compelling legitimate case for storing and processing that data.
- 7.2 After you or your child ceases to use a school IT system or have your data processed using a school IT system we may need to retain some or all of your personal data for a period of time as a necessary part of reporting on, or developing school services.
- 7.3 All data stored on school managed systems pertaining to normal school procedures may be stored for up to 6 years in accordance with our Data Retention policy. However, there may

be specific areas of school activity that we are required to store for longer or shorter periods as dictated by statutory or operational requirements.

- 7.4 All such archival data will be subject to specific access restrictions above that required for normal day-to-day school business, and where appropriate, aspects of this data may be anonymised.
- 7.5 Once your child has left, you may be provided with limited access to your child's academic reports and your child may be provided with limited access to their public exam results on the school management system.
- 7.6 A confidential paper disposal service will be used for any hard copy records that fall outside of the defined period of retention.

8. Your right to access, rectify, restrict or erase you or your child's personal data

- 8.1 You have the right to request access to any of your or your child's personal data stored on a school managed system, whether as "live" or archived data.
- 8.2 We shall respond to this request within 30 days of receiving the request, whereupon we will provide details of the personal data held including the source(s) of the data, the purposes for processing that data and the persons or organisations with which we may have shared that data.
- 8.3 There may also be circumstances under which there is a compelling legal or operational requirement for us to withhold any requested data.
- 8.4 Similarly, you have the right to request the rectification, restriction or erasure your personal data under the following circumstances (and subject to 8.3): you have contested the accuracy of your personal data, the processing of any personal data is considered unlawful or you have contested our need to continue to store or process your personal data.
- 8.5 We shall communicate any such rectification of personal data, restriction of processing or erasure of personal data within 30 days, unless this process is impossible or involves disproportionate effort.
- 8.6 Information resulting from any requested action will be communicated to you in a structured, commonly used, machine-readable format.
- 8.7 You have the right to object at any time to the processing of your personal data unless this relates to processing necessary for the carrying out of any task relating to a legal or statutory requirement.
- 8.8 You may address any such requests to the Chief Operating Officer, Mr. Gerard Hickie: GHickie@priorparkschools.com