



# Highclare School

## Pupil Privacy Notice

### WHAT THIS NOTICE IS FOR

This notice applies to all pupils of the School in U4 (Yr 9) or above, ie. at least aged 13 years. It is intended to provide information about how the school will use (or "process") personal data about current and past pupils. It is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Pupils should contact the Headmaster in the first instance if they have any queries about data protection.

### WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

The school may process a wide range of personal data about pupils as part of its daily operation. The School needs to process this data because of its many legitimate obligations and interests to provide education services and to monitor pupils' progress.

In addition, the school may need to process special category personal data, eg health and religion, to safeguard pupils' welfare and provide appropriate pastoral and to comply with its legal obligations.

### WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

- Occasionally, the school will need to share personal information with third parties, such as professional advisers or relevant authorities
- Relevant information on pupils with special educational needs will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.
- The School is under duties imposed by law and statutory guidance 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.
- Some of the school's processing activity is carried out on its behalf by third parties, such as IT systems and web developers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

### HOW LONG WE KEEP PERSONAL DATA AS PAST PUPILS

The school will retain personal data securely and only in line with how long it is necessary to keep. Typically, the legal recommendation for how long to keep pupil files is up to 7 years (up to 21 days for CCTV) following departure from the school. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. If you have any specific queries about how this policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Headmaster in the first instance. Please bear in mind that the school may have lawful and necessary reasons to hold on to some data.

### KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

- The School will use the contact details of past pupils to keep them updated about the activities of the school. The school may also share personal data about past pupils with organisations set up to help establish and maintain relationships with the school community, such as Friends of Highclare School, The Old Highclarians.
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Alumni Coordinator in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing.

## YOUR RIGHTS

- Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or for the school to stop processing it. Any individual wishing to access or amend their personal data or who has some other objection to how their personal data is used, should put their request in writing to the Headmaster in the first instance.
- The school will endeavour to 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. If the request is excessive or similar to previous requests, the school may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.
- Certain data is exempt from the right of access. The school is also not required to disclose any pupil examination scripts nor any confidential reference given by the school.

## PUPIL REQUESTS

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf. All information requests from, or on behalf of, pupils will be considered on a case by case basis.

## CONSENT

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent.

## WHOSE RIGHTS?

- The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental consent to process personal data relating to pupils (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.
- The school 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.
- 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, the school may be under an obligation to maintain confidentiality.
- Pupils are required to respect the personal data and privacy of others, and to comply with the school's policies and the school rules at all times.

## DATA ACCURACY AND SECURITY

- The school will endeavour to ensure that all personal data held in relation to pupils is up to date and accurate as possible.
- An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected.
- The school will take appropriate technical and organisational steps to ensure the security of personal data about pupils.

## THIS POLICY

The school will update this Pupil Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

### Linked policies:

- CCTV Policy
- ICT Acceptable Use Agreements
- Privacy notice - General
- Privacy notice - Pupils
- Privacy notice - Staff
- Privacy notice - Storage and Retention Of Records Policy
- Privacy notice - Taking, Storing and Using Images of Children Policy
- Safeguarding Policy
- Security Policy

Confirmed by Board:	Review Cycle	Most recent review:
May 2018	Three yearly	September 2023