Date: May 2021

Next Review due: May 2022

Responsibility: Principal/Bursar/Data Protection Coordinator

DAME ALLAN'S SCHOOLS PRIVACY NOTICE FOR PUPILS

1. INTRODUCTION

You have a legal right to be informed about how we, Dame Allan's Schools (referred to as "the Schools", which comprises Dame Allan's Junior School and Nursery, Dame Allan's Boys' School, Dame Allan's Girls' School and Dame Allan's Sixth Form, registered charity number 1084965 and company number 4002372) use any personal information that we hold about you.

This privacy notice explains how we collect, store and use personal data about you as a **pupil, including current and past pupils and pupils who apply to join the Schools**.

We are the 'data controller' for the purposes of data protection law.

Our Data Protection Coordinator is Mrs J. Taylor.

This Privacy Notice should be read together with our Data Protection Policy. It applies alongside any other information the Schools may provide about a particular use of personal data , for example, when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the Schools' other relevant terms and conditions and policies, including:

- any contract between the Schools and your parents;
- the Schools' policies, including:
    - the Taking, Storing and Using Images of Children Policy;

- the Retention of Records Policy;
- the CCTV policy;
- the Child Protection and Safeguarding Policy, including as to how concerns or incidents are recorded;
- the Whole School Policy on the Acceptable Use of Electronic Devices and Information Technology Systems;
- the Staff Code of Conduct.

Covid-19 Related processing

While we continue to be subject to pandemic conditions, the Schools may need to collect, share and otherwise process personal data in accordance with Government guidance. This may be for reasons not specifically set out in this Privacy Notice but always for the purposes of protecting public and individual health by seeking to limit the spread of coronavirus (Covid-19).

There are also separate privacy notices in respect of Covid-19 testing, which are available on the Schools' website.

2. THE PERSONAL DATA WE HOLD

We hold some personal information about you to make sure we can help you learn and look after you when you are at the Schools.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details (your name, date of birth, address, telephone number, identification documents);
- Your academic records, including test and exam results;
- Your attendance records;
- Your characteristics, like your ethnic background or any special educational needs;
- Any medical conditions you have and who to contact if you are taken ill;
- Details of any issues about your behaviour and discipline and any exclusions you have received;
- Your records about any safeguarding issues;
- Records relating to sports, music and other extra-curricular activities undertaken by you, whilst at or when representing the Schools or other external organisations;
- References and other information given to us by schools you have attended before coming to the Schools and any professionals or organisations who have worked with or who continue to work with you;

- Information needed to help you when you leave the Schools, such as UCAS numbers, university applications, predicted grades and grades needed to secure an offer from a university or to apply for a job;
- Your destinations, when they leave the Schools, including the university you are going to attend and which course you are going to study;
- Photographs and videos taken of you while you're at school and taking part in school activities, including times when you're away from school on tours, trips and visits;
- CCTV images taken by the Schools' CCTV cameras;
- If you are in Years 12 or 13, details of any vehicle you drive to the Schools and park close to the Schools' grounds.

3. SPECIAL CATEGORY DATA

We have a duty of care to look after your health and wellbeing. This means we will hold some information on you which is classed as special category data. Special category data includes any information concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, health, genetic or biometric data. Under data protection law we must fulfil additional requirements to use this data, which is detailed below.

4. WHY WE USE THIS DATA

We use this data to help run the Schools, including to:

- Provide your education, which includes musical education, physical training and spiritual development. Some of these may be provided remotely;
- Get in touch with you and your parents when we need to;
- Check how you are doing in exams and work out whether you need any extra help to support your progress;
- Provide you with appropriate online educational tools;
- Track how well the Schools are performing;
- Allow us to enter you into external national or other examinations and competitions, including sports tournaments, competitions and events;
- Look after your wellbeing and keep you safe while you are at the Schools. This may include taking action if there is an emergency, incident or accident;
- Help you obtain work (or work experience) or a place at a university when you leave the Schools;
- Provide you with a range of extra-curricular activities, including visits, trips and tours in the UK and abroad;
- Publish newsletters and other forms of communication about your achievements and about events taking place at the Schools, including yearbooks, programmes for concerts and other performances, Speech Day and other award presentations, either in hard copy or published on the Schools' website and social media channels;

- Publish teams for sporting fixtures and other events, either in hard copy (for example – on display boards) or published on the Schools' website, including the Schools' Sports Website (and its app), and social media channels;
- Share information about your parents and/or alumni (students, who have left the Schools) with organisations set up to help, establish and maintain relationships with the Schools' community, such as DASPA, DASPA(J) and the Allanian Society;
- Allow the Schools to give and receive information and references about you to/from any schools that you have attended or wish to attend;
- Allow the Schools to create displays of your and other pupils' work and achievements;
- Inform staff of any allergies you may have so they know how to look after you if you have a reaction;
- Keep our Schools secure, including by means of CCTV;
- Monitor that our IT and Communications systems are being used appropriately;
- Keep, for our Schools' archives, written and photographic records and archives of the Schools' classes, teams, pupils and key events each year for historic and research purposes;
- Follow public health requirements in respect of Covid-19 (or a similar event) testing, including managing testing of you and other pupils, processing the results of these tests and sharing this information with health authorities (for example, the NHS).

5. OUR LEGAL BASIS FOR USING THIS DATA

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We are performing our contract with you and your parents to provide your education and to ensure your safety while you are in our care;
- We need to comply with the law;
- We need to use it to carry out a task in the public interest (in order to provide you with an education).

Sometimes, we may also use your personal information where:

- You or your parents have given us permission to use it in a certain way;
- We need to protect your interests (or someone else's interest).

To process special category data we need an additional legal basis. We will process special category data most commonly where:

- We have your or your parents' consent;
- The processing is necessary under social security or social protection law;
- We are processing it in the case of an emergency or because someone's life is at risk;
- We are providing health care or treatment to you.

Where we have got permission to use your data, you or your parents may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Where we need your data to provide your education and other services, such as trips and extra-curricular activities, and for our legal obligations, such as safeguarding your welfare, if you don't give us the information we need we may not be able to enroll you or maintain your status as a pupil, or provide the other services.

6. COLLECTING THIS INFORMATION

While in most cases you, or your parents, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

Sometimes we receive personal information from other people or organisations - for example, another school which you have attended.

7. HOW WE STORE THIS DATA

We will keep personal information about you while you are a pupil at the Schools. We may also keep it after you have left the Schools. In most cases, this means storing some of your personal data until your 25th birthday, regardless of the age at which you leave the Schools. We are required to do this by law.

Our Retention of Records Policy sets out how long we keep information about our pupils. This is available on our website or a copy can be requested using the contact details set out below.

We keep personal information in paper and electronic form. This is always kept securely and access to it is limited to relevant members of the Schools' staff only.

Access to sensitive information

We follow particularly strict rules of access to information, which is sensitive:

a. Medical information

We need to know information about any medical conditions you may have (for example, allergies) so that we can keep you and others safe. Only a limited number of staff have access to this information, but sometimes (for example, when you go on a school trip), it may be necessary to tell additional people.

If you have any additional needs or disabilities, this information will need to be shared with staff more widely, so that they can care for you appropriately and ensure that you receive appropriate support.

b. Safeguarding information

The Schools are under a duty to keep you safe and to record or report incidents and concerns that arise or are reported to it. If these are serious, this information may need to be shared with outside agencies, including social services or the police.

If you leave the Schools to join another school or college, we have to share any information relating to safeguarding or child protection with them.

Data security

The Schools will always try to ensure that all of the personal information we keep about you is up to date and accurate. If your personal information changes, for example, you move house, we need to know the new details.

We have technical and organisational steps in place to keep your personal information safe. Staff and governors receive training in data protection issues.

8. DATA SHARING

We do not share personal information about you with anyone outside the Schools without permission from you or your parents, unless the law, our policies or the terms of this privacy notice allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Local authorities, (the name of the local authority will depend on where you live) – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- Government departments (for example, the Department for Education) and other authorities (for example, the NHS);
- Your family and representatives;
- Educators and examining bodies;
- Our regulator (the organisation or "watchdog" that supervises us), the Independent Schools Inspectorate;
- The Independent Schools Council for the purpose of allowing them to carry out their annual census;
- Suppliers and service providers – so that they can provide the services we have contracted them for. For example, some of the Schools' IT services, including the IT systems and cloud storage are carried out by different companies and we may ask tour operators and travel agents to organise tours, visits and trips for you to attend. Some organisers of competitions, tournaments or events (for example, sports) need to have your details, so that we can enter you or your team into those events. The agreements and understanding we have with these organisations always make sure that your personal data will be kept safe;
- Extra-curricular activity teachers and leaders, so that they can provide you with the sessions you or your parents have requested (for example, instrumental and voice lessons, LAMDA lessons, sports coaching);
- Central and local government;

- Our auditors;
- Survey and research organisations, including universities (for example, we use various testing tools provided by the Centre for Evaluation and Monitoring (CEM) as part of our assessment programme. This assists us to monitor your progress, inform our teaching and to understanding your potential);
- Health and social welfare organisations;
- Professional advisers and consultants;
- Charities and voluntary organisations;
- Police forces, courts, tribunals;
- Professional bodies.

9. NATIONAL PUPIL DATABASE

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census and the Early Years census.

Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities,exam boards and others.

The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on how it collects and shares research data.

You can also contact the Department for Education if you have any questions about the database.

10. YOUTH SUPPORT SERVICES

Once you reach the age of 13, we are legally required to pass on certain information about you to relevant local authorities and other local youth support providers in your area, as they have legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables them to provide youth support services, post-16 education and training services, and careers advisers.

Your parents, or you once you are 16, can contact our Data Protection Coordinator to ask us to only pass your name, address and date of birth to the above providers.

11. TRANSFERRING DATA INTERNATIONALLY

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by telling you what we intend to do, by following data protection law and by ensuring appropriate safeguards are in place. We do not share data in this way very often – usually only if you are going on a trip or tour outside of the European Economic Area.

12. YOUR RIGHTS

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a **'subject access request'**, as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding and using it, and how long we will keep it for;
- Explain where we got it from, if not from you or your parents;
- Tell you who it has been, or will be, shared with;
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person). Currently we do not carry out any automated decision making or profiling. If this changes we will let you know;
- Give you a copy of the information.

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

The Schools are not required to disclose your examination scripts (or other information consisting solely of your test answers – although markers' comments may still be disclosable if they contain your personal data); provide examination or other test marks ahead of their ordinary publication date; nor share any confidential reference held by the Schools that was (or will be) given for the purposes of your education, training, appointment or employment.

We will assume that you are happy for your personal information being disclosed to your parents (for example, progress reports and reports relating to your behaviour). However, if you have any concerns about this, you should speak to a member of staff.

You should respect the confidentiality of personal information and privacy of others and comply with the Schools' Policy on the Acceptable Use of Electronic Devices and Information Technology Systems and the School rules

If you want to make a request please contact our Data Protection Coordinator.

Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress;
- Stop it being used to send you marketing materials;
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person);
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it;
- Request that electronic personal data about you be transferred to another organisation in some cases;
- Where we are processing personal data with your consent, for example if we asked to post a photograph of you on our website and you said yes, you can change your mind by contacting the Data Protection Coordinator;
- Claim compensation if the data protection rules are broken and this harms you in some way.

13. EDUCATIONAL RECORDS

You should not confuse a subject access request with a request for a copy of your educational record.

As an independent school we are not legally bound to provide you with a copy of your educational record; however we are happy to provide a copy of these records to you in line with our Data Protection Policy, subject to a £10 administration fee. Requests for educational records should be made to the contact address below.

14. COMPLAINTS

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we have done something wrong.

You can make a complaint at any time by contacting our Data Protection Coordinator.

You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

15. CONTACTING US

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Coordinator:

Name: Mrs J. Taylor

Address: Bursar's Office, Dame Allan's Schools, Fowberry Crescent, Fenham, Newcastle upon Tyne, NE4 9YJ

Tel: 0191 274 5910

Email: j.taylor@dameallans.co.uk

The Schools will update this 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.