



ST LAWRENCE  
COLLEGE

# **How We Use Your Child's Information Junior School Pupil Privacy Notice for Parents - Full**

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**Independent Day and Boarding School for Boys and Girls**

**St Lawrence College**

May 2018

## **Introduction**

This notice is to help parents understand **how** and **why** we collect your child's personal information and **what** we do with that information. It also explains the decisions that you can make about your child's information.

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please talk to the Bursar.

## **What is "personal information"?**

Personal information is information that the School holds about your child and which identifies your child.

This includes information such as their date of birth and address as well as things like exam results, medical details and behaviour records. The School may also record your child's religion or ethnic group. CCTV, photos and video recordings of your child are also personal information.

## **How and why does the School collect and use personal information?**

We set out below examples of the different ways in which we use personal information and where this personal information comes from. Our primary reason for using your child's information is to provide your child with an education.

The admissions forms which you complete give us personal information about your child. We get information from your child, his/her teachers and other pupils. Your child's old school also gives us information about your child if we need this to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after your child.

We collect this information to help the School run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell all appropriate members of staff if your child is allergic to something or might need extra help with some tasks.
- We may need to share information about your child's health and wellbeing with the School doctor or counsellor.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may need to report some of your child's information to the government. For example, we may need to tell the local authority that your child attends the School or let them know if we have any concerns about your child's welfare.
- We may need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other pupils at the School.
- If your child is from another country we have to make sure that they have the right to study in the UK. We might have to provide their information to UK Visas and Immigration.

- Depending on where your child will go when they leave us we may need to provide their information to other schools and colleges. For example, we may share information about your child's exam results and provide references. We may need to pass on information which they need to look after your child.
- If your child takes public examinations we will need to share information about them with examination boards. For example, if your child requires extra time in exams.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your child's classmates is injured at School or if there is a burglary.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your child's information with them if this is relevant to their work.
- If your child has misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your child's academic and (where fair) their behaviour records with you or their education guardian so you can support their schooling.
- We will only share your child's information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
- We will monitor your child's use of email, the internet and mobile electronic devices eg iPads. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read the IT acceptable use policy or speak to your child's teacher.
- We may use photographs or videos of your child for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- If you have any concerns about us using photographs or videos of your child please speak to your child's teacher.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the news to tell people about what we have been doing.
- We may keep details of your child's address when they leave so we can send them the Old Lawrentian (OL) magazine and find out how they are getting on. We may also pass their details onto the OL Society. Further information on the OL Society can be found on the OL Society website.

If you have any concerns about the above, please speak to your child's teacher.

## Our legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your child's information.

### Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to your child. The School relies on legitimate interests for most of the ways in which it uses your child's information.

Specifically, the School has a legitimate interest in:

- Providing your child with an education.
- Safeguarding and promoting your child's welfare and the welfare of other children.
- Promoting the objects and interests of the School. This includes fundraising eg if we want to raise money to fund school places or build new buildings.
- Facilitating the efficient operation of the School.
- Ensuring that all relevant legal obligations of the School are complied with.

In addition, your child's personal information may be processed for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another pupil.

If you object to us using your child's information where we are relying on our legitimate interests, as explained above, please speak to the Bursar.

### Legal obligation

Where the School needs to use your child's information in order to comply with a legal obligation, for example to report a concern about your wellbeing 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.

### Public interest

The School considers that it is acting in the public interest when providing education.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

### Substantial public interest

The processing is necessary for reasons of substantial public interest.

### Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

### Legal claims:

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your child's information in certain ways. If we ask for your consent to use your child's personal information you can take back this consent at any time. Any use of your child's information before you withdraw your consent remains valid. Please speak to your child's teacher if you would like to withdraw any consent given.

### **Sending information to other countries**

We may send your child's information to other countries where:

- we store information on computer servers based overseas; or
- we communicate with you when you are overseas (for example, during the summer holidays if you live in a different country).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is in the UK.

### **For how long do we keep your child's information?**

We keep your child's information for as long as we need to in order to educate and look after them. We will keep certain information after your child has left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your child's information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

We can keep information about your child for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

The table below shows for how long we keep different types of information about your child.

<b>Basic file description</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>
Admission Registers		Date of last entry in the book (or file) + 6 years
Attendance registers		Date of register + 3 years
Pupil record cards		

Basic file description	Statutory Provisions	Retention Period [operational]
<ul style="list-style-type: none"> <li>Primary</li> </ul>		Retain for the time which the pupil remains at the primary school then transfer to next school <sup>1</sup>
<ul style="list-style-type: none"> <li>Secondary</li> </ul>		DOB of the pupil + 25 years
Primary Pupil files		Retain for the time which the pupil remains at the primary school then transfer to next school
Special Educational Needs files, reviews and Individual Education Plans		DOB of the pupil + 25 years <sup>2</sup>
Letters authorising absence		Date of absence + 2 years
Absence books		Current year + 6 years
Examination results		
<ul style="list-style-type: none"> <li>External examination results</li> </ul>		Year of examinations + 6 years
<ul style="list-style-type: none"> <li>Internal examination results</li> </ul>		Current year + 5 years <sup>3</sup>
Any other records created in the course of contact with pupils		Current year + 3 years
Statement maintained under The Education Act 1996 - Section 324	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years
Proposed statement or amended statement	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years

## What decisions can you make about your child's information?

From May 2018 you will be able to make various decisions about your child's information. Some of these are new rights whilst others build on your child's existing rights. Your child's rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about your child and be provided with a copy. We will also give you extra information, such as why we use this information about your child, where it came from and what types of people we have sent it to;

<sup>1</sup> In the case of exclusion it may be appropriate to transfer the record to the Behaviour Service

<sup>2</sup> As above

<sup>3</sup> If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary.

- you can ask us to delete the information that we hold about your child in certain circumstances. For example, where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about your child in a format that can be read by computer;
- our use of information about your child 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.

The Bursar can give you more information about your child's data protection rights.

### **Further information and guidance**

This notice is to explain how we look after your child's personal information. The Bursar can answer any questions which you might have.

Please speak to the Bursar if:

- you object to us using your child's information for marketing purposes eg to send your child information about school events. We will stop using your child's information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about your child; or
- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office: <https://ico.org.uk/>.