

Pupils and Parents Privacy Notice

Introduction

This notice is intended to meet the requirement, under the General Data Protection Regulation (GDPR)¹, to provide certain information when personal data is collected. The notice is addressed to parents and pupils and includes the identity and contact details of the data controller, the purposes and legal bases for the processing, as well as other information confirming how we ensure fair and transparent processing.

Details of the Controller

Twyford School (“School”) is the controller of personal data collected from parents and pupils. The School may be contacted at Twyford School, Twyford, Hampshire, SO21 1NW, by telephone on 01962 712269, and by email at privacy@twyfordschool.com.

Purpose and Lawful Basis for Processing

Purposes

The School processes personal data to identify, care for, educate and record the progress of its pupils, to maintain its contractual relationship with parents and to meet a range of statutory obligations. To fulfil these purposes the School processes a wide range of personal information including:

- Names, address, telephone numbers, e-mail addresses and any other form of contact details;
- Dates of birth, gender, nationality and ethnicity;
- Passport details;
- Parental (fee payer) bank details;
- Past, present and future pupils’ academic, SEN, disciplinary, attendance and admission records and examination papers and marks;
- Pupils’ health data and contact details for their next of kin or guardian;
- References – given and received – by the School about pupils and information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- Pupils’ images, (both photographic and content captured by the School’s CCTV system (in accordance with the School’s policies).

Lawful Basis

The School processes personal data to support the provision of education within its charitable objects. This processing is lawful because, for each purpose, at least one of the following applies²:

1. the data subject has given consent to the processing for one or more specific purposes

¹ Article 13 of the GDPR

² Based on GDPR Article 6 – Lawfulness of processing.

2. processing is necessary for the performance of a contract to which the data subject is party
3. processing is necessary for compliance with a legal obligation to which the School is subject
4. processing is necessary in order to protect the vital interests of the data subject
5. processing is necessary for the purposes of the legitimate interests pursued by the School

Legitimate interests processing

Legitimate interests include:

- The admissions process for new pupils (and to confirm the identity of prospective parents);
- To use photographic images and names of pupils in school publications and on the School website in accordance with the School's policy on taking, storing and using images of children where parental consent has previously been given.
- For the purposes of management, planning and forecasting and for statistical purposes including that requested for legal purposes;
- To allow relevant authorities to monitor the School's performance and to assist or intervene with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils to and from any educational establishment previously attended or provide to future schools;

Processing and Sharing

The processing of personal data by the School may be achieved by using third-party data processors (such as the core management information system) as well as sharing information with other data controllers (such as allergen data with caterers). Where third-party processing and/or data sharing is required, suitable agreements are in place.

Special category data

The School may need to process special category personal data (health, ethnicity, religion, biometrics, genetics or sexual orientation) or criminal records information (Disclosure and Barring Service (DBS) checks). Where such data is required, explicit consent will be requested. Purposes may include:

- The safeguarding of pupils' welfare and the provision of appropriate medical and pastoral care;
- To take appropriate action in the case of an emergency, incident or accident including the disclosure of an individual's medical condition where it is in the individual's vital interests to do so;
- To provide specific educational services to a pupil with Special Educational Needs (SEN);
- For legal and regulatory purposes and to comply with its legal obligations and duties of care. (e.g. child protection, health and safety and UKVI sponsorship.)

Fair and Transparent Processing

Data retention

The School will retain data in line with its Retention of Records Policy. We will keep information only for as long as is necessary for legitimate and lawful reasons. For example, pupil records will be retained no longer than the 25th year from the child's birth. For some purposes, we are required to retain records indefinitely.

Your Rights

You have the right to request access to and rectification or erasure of personal data or restriction of processing concerning you or to object to processing as well as the right to data portability. Where processing is based on consent, you have the right to withdraw consent at any time.

Consent

Where the School is relying on consent as a means to process personal data, any parent may withdraw consent at any time. Please be aware 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 asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement.

Complaints

You have the right to lodge a complaint with the Information Commissioner's Office (ICO). The ICO encourages potential complainants to attempt to resolve issues with the controller before submitting complaints.

Statutory or Contractual Provision

Certain personal data is necessary for the performance of the contract between parents and the School and/or for the latter to meet its statutory obligations. Where such data is withheld, a breach (by the parent or guardian) and termination of contract may result.

Automatic Decision Making

The School does not engage in automated decision-making, including profiling as referred to in Article 22 of the GDPR.

May 2018

This Privacy Notice will be updated from time to time. Any substantial change affecting your or your children's rights will be provided to you directly as far as is reasonably practicable. Any comments or queries on this Privacy Notice should be directed in the first instance to the Bursar at bursar@twyfordschool.com