

RGSHW PARENT & PUPIL PRIVACY NOTICE

This privacy notice provides detailed information about how RGSHW as Data Controller for the purposes of GDPR and data protection law as amended from time to time, processes personal data. For a summary breakdown of how we use your data please see Appendix 1. Appendix 2 provides a more detailed breakdown of data collection, storage and sharing. Please read them carefully as they describe how we process personal data about prospective, current and past: pupils and their parents, donors, friends and supporters of the School.

RGSHW takes your privacy seriously and is committed to ensuring compliance with its legal obligations to process pupils' and parents' data lawfully, fairly, and transparently for the purpose for which it was obtained accordingly, set out below are details of your rights in relation to your data, relevant contact details in the event of a data breach or any questions you may have.

Your Rights

Core Individual Rights

Please note that the following rights are available to you in connection with all processing of your personal data:

Right of Access

You may seek confirmation as to whether your personal data is processed by RGSHW and we will provide you with information concerning the use of such data and a copy of the personal data processed.

Right of Rectification of Inaccurate Data

Any personal data which is inaccurate or incomplete must be rectified by RGSHW and, if so requested, we will provide you with a statement showing the changes.

Right of Erasure or the Right to be Forgotten

You have the right to have your personal data erased by RGSHW where processing it is no longer necessary in relation to the original purpose for which it was collected or it has been unlawfully processed or where we are required to erase it to comply with a legal obligation applicable under the laws of England and Wales or EU law.

Right of Restriction of Processing

In the event that:

- you contest the accuracy of any personal data RGSHW processes about you, you may require that further processing of such data is restricted pending verification of the accuracy of the data
- processing is unlawful, you may request restriction of further data processing as opposed to erasure
- RGSHW requires your personal data in order to establish, bring or defend a legal claim even though it no longer requires the data for its original purpose, you may request that the processing is restricted pending final resolution of the claim

Conditional Rights

Erasure

Where RGSHW processes your data based on explicit consent, if you withdraw that consent and RGSHW has not relied on any other legal ground for processing (see Appendix), you have the right to request erasure of that data.

Data Portability

If RGSHW processes personal data based on your consent or in order to enter into a contract with you, you may obtain that personal data directly from RGSHW in any structured, commonly used, machine readable format or indirectly by us providing it to any applicable third party you choose to nominate.

Objection to Processing

You may object to further processing of your personal data where we have relied on the ground of legitimate interests unless RGSHW can demonstrate compelling grounds to continue such processing which override your individual interests, rights and freedoms.

Pending verification of the latter, you may obtain restriction of further processing and, in the event that RGSHW cannot successfully demonstrate compelling legal grounds to continue processing which override your interests, RGSHW will erase the personal data.

Relevant Contacts

If you believe any of your rights have been breached in connection with processing of your personal data, you have the right to lodge a complaint with a supervisory authority of any Member State of the European Union, in particular the UK where you have your habitual residence or place of work or where the alleged breach took place.

If you have any questions in relation to this Privacy Notice or processing of your personal data generally please do not hesitate to contact me at dataofficer@rgshw.com.

Yours sincerely

Mark Purdom
DPO RGS High Wycombe

Appendix 1- What data we collect and why

What data we collect	What we use the data for	Our reasons (legal basis)
Student and parental information	Communication and student identification, to support learning and teaching, monitor and report on your son's progress, provide appropriate pastoral care, assess how well the School is doing.	Legal obligation.
Safeguarding information	To ensure the health and safety of our students. The data may be shared to safeguard a pupils' welfare.	Legal Obligation
Medical	Health, safety and well-being of the individual.	Consent.
Ethnic cultural information	Shared with DfE for census data. Examination analysis to ensure RGS provides appropriate support for our students. Data is also shared with the Fisher Family Trust in supporting examination analysis.	Compliance with the legal obligation from the DfE.
Pupil Premium	To ensure the school receives the funding to be able to provide support for the individual.	Legitimate interest.
Special Educational Needs	To ensure that the school is fully prepared to support all individuals.	Consent.
Previous Education	To maintain the tracking of a student throughout their education.	Legitimate interest.
Biometric	If opt in is selected, the data is used for the following: Attendance, Library, School Shop and Canteen. Your consent may be withdrawn at any time by writing to the RGS with such a request.	Consent. This is in accordance with the requirements of the Protection of Freedoms Act, 2012.
Parents' Association and Friends' of groups	If opt in is selected, the data is used to enable the Parents' Association to communicate activities and matters of interest to parents.	Consent.
Photography	The images are used for identity management and allergy awareness.	Legitimate and vital interest.
Photography (consent)	If opt in is selected, the images are used for promotion and marketing resources.	Consent.
Educational Day Trips (consent)	To ensure the health, safety and well-being of the individual on a school trip	Consent, legitimate and vital.
Personal information collected The Buckinghamshire Grammar Schools (as part of the Buckinghamshire secondary transfer testing process if your child does not attend a state sector primary school in Buckinghamshire. Information includes a photograph of your child, information about medical issues and contact details.	To ensure the child can be identified and to ensure the health, safety and well-being of the child.	Legitimate and vital.

Appendix 2- Detailed Breakdown of Data Use, Collection, Storage and Sharing

The Personal Data held by the School

Personal data that the School may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Personal details such as full name, home address, contact details of pupils and/or parents, gender, date of birth
- Next of kin and emergency contact details
- Images of pupils and staff (and occasionally other individuals) engaging in School activities
- Identification documents
- CCTV images for security purposes
- Attendance data
- Pupils' performance at School, including assessments, reports, exam results, behaviour reports and discipline or sanctions record
- Data about pupil use of the School's e-mail and internet and other internal ICT communications.
- Safeguarding information

The School may also collect, store and use information about pupils that falls into '**special category data**' of more sensitive personal data. This includes information about health, details of any illnesses, allergies or other medical conditions, special needs, learning support or reasonable adjustment, counselling, therapy, care plans, accidents, health monitoring, ethnicity, and religious or other similar beliefs, safeguarding and child protection information.

The School may also hold data about pupils that has been received from other organisations, including other schools, local authorities and the Department for Education.

Why the School uses this Data

The School uses this data to:

- Support the pupils' teaching and learning
- Fulfil the Admissions process
- Assess and report on pupils' progress
- Assess how well the School as a whole is doing
- Publish examination results such as the global and anonymous but not individual results of a particular year group
- Fulfil our safeguarding obligations towards pupils
- Enable financial and staff recruitment planning
- Provide appropriate pastoral care to pupils
- Enable or assist pupils to obtain a place at university or college after they leave the School
- Monitor pupils' email communications and internet use for the purpose of ensuring compliance with and strictly in accordance with the School's ICT Security and Safeguarding & Child Protection and any other related policies
- Communicate with former pupils
- Where appropriate promote the School to prospective pupils and parents (including through the School's prospectus, website and social media applications)
- For other reasonable purposes relating to the efficient operation and smooth running of the School business including to obtain appropriate professional advice and insurance for the School

Collection of Data

The School will only collect personal data for specified, explicit and legitimate reasons. If the School wishes to use personal data for reasons other than those provided when we first obtained it, we will inform the individuals concerned and obtain consent before we do so. In general, 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 pupils' welfare, unless, in the School's opinion, there is a good reason to do otherwise. However, 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 unless, in the School's opinion, there is a good reason to do otherwise; for example, where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

How the School stores this Data

The School retains personal data about pupils during their schooling electronically on the School's information management systems, the School's network, GDPR-compliant cloud-based storage, or manually in pupil files or profiles. The School may also keep data beyond the duration of the pupil's schooling at the School if this is necessary in order to comply with our legal obligations and legitimate interests. The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including the use of technology and devices, and access to School systems. All staff will be made aware of this Privacy Notice and of their respective duties and obligations to pupils and parents under GDPR and data protection law as amended from time to time and have or will receive suitable training.

Data Sharing

In the main, personal data collected by the School will remain within the School and in GDPR compliant, security-controlled, cloud-based storage and will be processed by appropriate members of staff only in accordance with GDPR and data protection legislation as amended from time to time. The School will not normally share personal data of pupils with third parties other than parents, but may do so where there is an issue that puts the safety of a pupil or our staff at risk or when we need to liaise with other agencies.

The School may share data:

- To enable the relevant authorities to monitor the School's performance, for example Ofsted
- To compile statistical information (normally used on an anonymous basis) for annual and other data survey
- To safeguard pupils' welfare and provide appropriate pastoral, medical or occupational health care

- When specifically requested so to do by pupils and/or their parents
- Where necessary in connection with learning and extra-curricular activities undertaken by pupils for example, educational visits, residential trip providers
- To enable pupils to take part in national and other assessments and to monitor pupils' progress and educational needs
- To obtain appropriate professional advice and insurance for the School
- Where a reference or other information about a pupil or former pupil is requested by another school or employer to whom they have applied
- To undertake financial transactions
- To secure funding for the School (and where relevant on behalf of individual pupils)
- For research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided
- **For use by the School of online academic and educational services**
- For use by the School of GDPR compliant cloud-based servers and IT services such as email and file storage for staff and pupils

Particular care with regard to data sharing is taken in the context of:

- medical records held and accessed only by the School Matron and appropriate staff who need to share the information in order to provide appropriate care and support to the pupil or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

A certain amount of any special needs, learning support or reasonable adjustment relevant information for pupils will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Our suppliers or contractors need data to enable us to provide services to our staff and pupils, for example ICT support, and catering.

In the course of our Data Protection Audit, and creation of Risk Register, we have enquired of third party data processors as to the steps they have taken in order to ensure their compliance with GDPR principles of fair and secure data processing.

The School will also share personal data with law enforcement and government bodies where we are legally required to do so, including for the prevention or detection of crime and/or fraud, the apprehension or prosecution of offenders, in connection with legal proceedings, or where the disclosure is required to satisfy our safeguarding obligations.

The School may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

The School will only transfer personal data to a country or territory outside the European Economic Area if satisfied that the transferee will only process the data in accordance with data protection law.

Parental Rights regarding Personal Data of Pupils

Parents of a child under 13 or where a child is not considered mature enough to be able to give informed consent, have a right to make a 'Data Subject Access Request' to gain access to personal information that the School holds about their child. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data held
- The purposes of the data processing
- The categories of personal data concerned
- The identity of those with whom the data has been, or will be, shared
- The duration of retention of data
- The source of the data, if not the data subject.

If you would like to make a request, please contact the School's Data Protection Office (DPO), dataofficer@rgshw.com

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal information we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

Under GDPR legislation, at the age of 13 pupils are responsible for their own data. At the beginning of Year 9 all students will confirm if they would like us to continue to process their data as stated in this form. Post 18 we will continue to correspond with parents until the student leaves the school.