# NEWLANDS GIRLS' SCHOOL POLICY DOCUMENT



# **Privacy Notices**

LAST UPDATED	(by) Kate Foreman	February 2024
LAST REVIEWED	(by) Kate Foreman	February 2024
POLICY TYPE	Statutory	
REVIEW DATE	February 2025	
RESPONSIBLE		
Leadership Team	Kate Foreman, School Business Manager	
Governing Committee	Resources Committee	
APPROVED		
	Meeting Date	
UPDATE: Shared Drive Website (if applicable)		

Courage Commitment Compassion

# Newlands Girls' School Privacy Notice for Pupils

#### 1. Introduction

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This notice explains how we collect, store and use personal data about pupils at our school, like you.

We, Newlands Girls' School, Farm Road, Maidenhead, SL6 5JB (Telephone 01628 625068), are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Turn It On Limited (Co. Reg. No. 04995157)

The School Data Protection Lead is the School Business Manager, Mrs Kate Foreman.

## 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 at school.

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

Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- > Your contact details
- > Your test results
- > Your attendance records
- > Details of any behaviour issues or exclusions

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- > Information about your characteristics, like your ethnic background or any special educational needs
- > Information about any medical conditions you have
- > Photographs and CCTV images

# 3. Why we use this data

We use the data listed above to:

- a) Get in touch with you and your parents when we need to
- b) Check how you're doing in exams and work out whether you or your teachers need any extra help
- c) Track how well the school as a whole is performing
- d) Look after your wellbeing
- e) Include photographs in school displays and newsletters

#### 3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes or services that you might be interested in.

You can take back this consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

#### 3.2 Use of your personal data in automated decision making and profiling

We don't currently put your personal information through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

# 4. Our lawful basis for using this data

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this.

Our lawful bases for processing your personal information for the reasons listed in section 3 above are:

- > For the purposes of 3a) to 3e), in accordance with the 'public task' basis we need to process data to fulfil our official duties as a school as set out here:
  - regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
- > For the purposes of 3a) to 3e), in accordance with the 'legal obligation' basis we need to process data to meet our responsibilities under law as set out here:
  - Section 537A of the Education Act 1996
  - The Education Act 1996 s29(3)
  - The Education (School Performance Information) (England) Regulations 2007
  - regulations 5 and 8 School Information (England) Regulations 2008
  - the Education (Pupil Registration)(England)(Amendment) Regulations 2013
- > For the purposes of 3d), in accordance with the 'vital interests' basis we will use this personal data in a life-or-death situation
- > For the purposes of 3e), in accordance with the 'consent' basis we will obtain consent from you to use your personal data

Where you've provided us with consent to use your information, you may take back this consent at any time. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

#### 4.1 Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- > We have obtained your explicit consent to use your information in a certain way
- > We need to use your information under employment, social security or social protection law
- > We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- > The information has already been made obviously public by you
- > We need to use it to make or defend against legal claims

- > We need to use it for reasons of substantial public interest as defined in legislation
- > We need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- > We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- > We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- > We have obtained your consent to use it in a specific way
- > We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- > The data concerned has already been made obviously public by you
- > We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- > We need to use it for reasons of substantial public interest as defined in legislation

## 5. Collecting this data

While most of the information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we want to collect information from you, we make it clear if you have to give us this information (and if so, what the possible consequences are of not doing that), or if you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local councils
- > Government departments or agencies
- > Police forces, courts, tribunals

#### 6. How we store this data

We keep personal information about you while you're attending our school. We may also keep it beyond your attendance at our school if this is necessary. Our record retention schedule sets out how long we keep information about pupils.

The school uses the Information and Records Management Society's toolkit for schools as our record retention schedule. A copy of the record retention schedule can be obtained by emailing kateforeman@newlandsgirls.co.uk.

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We'll dispose of your personal data securely when we no longer need it.

#### 7. Who we share data with

We don't share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it's legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- ➤ Our local authority, RBWM to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- > Government departments or agencies such as the Department of Education to meet our legal obligations and to fulfil our official function as a school.

- > Our regulator, Ofsted, to meet our legal duties.
- > Educators and examining bodies to enable us to fulfil our official function as a school
- > Suppliers and service providers eg. Accent Catering Services, PiXL so that we can provide the services we have contracted them for
- > Financial organisations where permission has been given eg. epayment systems for catering and school trips
- > Central and local government in order to fulfil our official function as a school
- > Our auditors in order to fulfil our legal obligations
- > Health and social welfare organisations to fulfil our legal duties and ensure the vital interests of our pupils
- > Professional advisers and consultants so that they can provide the services they have been contracted for in the interests of the school
- > Police forces, courts, tribunals in order to comply with our legal obligations

#### **National Pupil Database**

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

Some of this information is then stored in the <u>National Pupil Database</u>, 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, such as organisations that 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 <u>how it collects and</u> shares research data.

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

#### 7.1 Transferring data internationally

We may share personal information about you with international third parties outside of the UK, where different data protection law applies, eg. to facilitate international school trips.

Where we transfer your personal data to another country we will follow UK data protection law.

In cases where we have safeguarding arrangements in place, you can get a copy of these arrangements by contacting us.

# 8. Your rights

#### 8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (unless there's a really good reason why we shouldn't):

- > 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
- > Tell you who it has been, or will be, shared with

- > Let you know whether any automated decision-making is being applied to the data (decisions made by a computer or machine, rather than by a person), and any consequences of this
- > Give you a copy of the information in an understandable form

You may also have the right for your personal information to be shared with another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

### 8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

- > Say that you don't want your personal information to be used
- > Stop it being used to send you marketing materials
- > Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- > In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- > Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach
- > Make a complaint to the Information Commissioner's Office
- > Claim compensation if the data protection rules are broken and this harms you in some way

To exercise any of these rights, please contact us (see 'Contact us' below).

# 9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please let us know first.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- > Report a concern online at <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>
- > Call 0303 123 1113
- ➤ Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

#### 10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Our data protection officer is:

> Turn It On Limited who can be contacted by email <a href="mailto:dpo@turniton.co.uk">dpo@turniton.co.uk</a> or by phone 01865 597620 option 3.

However, our data protection lead has day-to-day responsibility for data protection issues in our school.

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

> Kate Foreman – email kateforeman@newlandsgirls.co.uk

### **Newlands Girls' School**

# **Workforce Privacy Notice**

#### 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **individuals we employ**, **or otherwise engage to work at our school**.

We, Newlands Girls' School, Farm Road, Maidenhead, SL6 5JB (Telephone 01628 625068), are the 'data controller' for the purposes of data protection law.

Our data protection officer is Turn It On Limited (Co. Reg. No. 04995157)

The School Data Protection Lead is the School Business Manager, Mrs Kate Foreman.

## 2. The personal data we hold

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

- Contact details
- > Date of birth, marital status and gender
- > Next of kin and emergency contact numbers
- > Salary, annual leave, pension and benefits information
- > Bank account details, payroll records, National Insurance number and tax status information
- ➤ Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- > Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- > Performance information
- > Outcomes of any disciplinary and/or grievance procedures
- > Absence data
- > Copy of driving licence

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- > Any health conditions you have that we need to be aware of
- > Sickness records
- > Photographs and CCTV images captured in school
- > Trade union membership
- > Ethnicity and Religious beliefs

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

## 3. Why we use this data

We use the data listed above to:

- a) Enable you to be paid
- b) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- c) Support effective performance management
- d) Inform our recruitment and retention policies
- e) Allow better financial modelling and planning
- f) Enable equalities monitoring
- g) Improve the management of workforce data across the sector
- h) Support the work of the School Teachers' Review Body

#### 3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

#### 3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

# 4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- > For the purposes of items 3b) to 3h) above, in accordance with the 'public task' basis we need to process data to fulfil our statutory function as a school as set out here:
  - section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
- > For the purposes of items 3b) to 3h) above, in accordance with the 'legal obligation' basis we need to process data to meet our responsibilities under law as set out here:
  - section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
- > For the purposes of 3f) in accordance with the 'consent' basis we will obtain consent from you to use your personal data
- > For the purposes of 3b), in accordance with the 'vital interests' basis we will use this personal data in a life-or-death situation
- > For the purposes of 3a), in accordance with the 'contract' basis we need to process personal data to fulfil a contract with you or to help you enter into a contract with us

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

#### 4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- > We have obtained your explicit consent to use your personal data in a certain way
- > We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- > We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- > The data concerned has already been made manifestly public by you
- > We need to process it for the establishment, exercise or defence of legal claims
- > We need to process it for reasons of substantial public interest as defined in legislation
- > We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- > We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- > We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- > We have obtained your consent to use it in a specific way
- > We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- > The data concerned has already been made manifestly public by you
- > We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- > We need to process it for reasons of substantial public interest as defined in legislation

# 5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- > Police forces, courts, tribunals

#### 6. How we store this data

We keep personal information about you while you work at our school. We may also keep it beyond your employment at our school if this is necessary. Our record retention schedule sets out how long we keep information about staff.

The school uses the Information and Records Management Society's toolkit for schools as our record retention schedule. A copy of the record retention schedule can be obtained by emailing kateforeman@newlandsgirls.co.uk.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

#### 7. Who we share data with

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- ➤ Our local authority, RBWM to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- > Government departments or agencies such as the Department of Education to meet our legal obligations and to fulfil our official function as a school.
- > Our regulator, Ofsted, to meet our legal duties.
- > Educators and examining bodies to enable us to fulfil our official function as a school
- Suppliers and service providers eg. Accent Catering Services, PiXL so that we can provide the services we have contracted them for
- > Financial organisations where permission has been given eg. epayment systems for catering and school trips
- > Central and local government in order to fulfil our official function as a school
- > Our auditors in order to fulfil our legal obligations
- > Health and social welfare organisations to fulfil our legal duties and ensure the vital interests of our pupils
- > Professional advisers and consultants so that they can provide the services they have been contracted for in the interests of the school
- > Police forces, courts, tribunals in order to comply with our legal obligations

#### 7.1 Transferring data internationally

We may share personal information about you with international third parties outside of the UK, where different data protection law applies, eg. to facilitate international school trips.

Where we transfer your personal data to another country we will follow UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

# 8. Your rights

#### 8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- > Give you a description of it
- > Tell you why we are holding and processing it, and how long we will keep it for
- > Explain where we got it from, if not from you
- > Tell you who it has been, or will be, shared with

- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- > Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

#### 8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- > Object to our use of your personal data
- > Prevent your data being used to send direct marketing
- > Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- > In certain circumstances, have inaccurate personal data corrected
- > In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- > Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- > In certain circumstances, be notified of a data breach
- > Make a complaint to the Information Commissioner's Office
- > Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

# 9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- > Report a concern online at <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>
- > Call 0303 123 1113
- ➤ Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

#### 10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Our data protection officer is:

➤ Turn It On Limited who can be contacted by email <a href="mailto:dpo@turniton.co.uk">dpo@turniton.co.uk</a> or by phone 01865 597620 option 3.

However, our data protection lead has day-to-day responsibility for data protection issues in our school.

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

> Kate Foreman – email <a href="mailto:kateforeman@newlandsgirls.co.uk">kateforeman@newlandsgirls.co.uk</a>

## **Newlands Girls' School**

# **Volunteers & Governors Privacy Notice**

#### 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **individuals working with our school in a voluntary capacity, including governors/trustees**.

We, Newlands Girls' School, Farm Road, Maidenhead, SL6 5JB (Telephone 01628 625068), are the 'data controller' for the purposes of data protection law.

Our data protection officer is Turn It On Limited (Co. Reg. No. 04995157)

The School Data Protection Lead is the School Business Manager, Kate Foreman.

## 2. The personal data we hold

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

- > Contact details
- > References
- > Evidence of qualifications
- > Employment details
- > Information about business and pecuniary interests

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- > Information about any health conditions you have that we need to be aware of
- > Information about disability and access requirements
- > Photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

# 3. Why we use this data

We use the data listed above to:

- a) Establish and maintain effective governance
- b) Meet statutory obligations for publishing and sharing governors'/trustees' details
- c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- d) Undertake equalities monitoring
- e) Ensure that appropriate access arrangements can be provided for volunteers who require them
- f) Include photographs in school displays and newsletters

#### 3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

#### 3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

## 4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- > For the purposes of 3a), 3b) and 3c), in accordance with the 'public task' basis we need to process data to fulfil our statutory function as a school as set out here:
  - Academies Financial Handbook
- > For the purposes of 3a),3b) and 3c), in accordance with the 'legal obligation' basis we need to process data to meet our responsibilities under law as set out here:
  - Academies Financial Handbook
- ➤ For the purposes of 3f) in accordance with the 'consent' basis we will obtain consent from you to use your personal data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

#### 4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- > We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- > We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- > The data concerned has already been made manifestly public by you
- > We need to process it for the establishment, exercise or defence of legal claims
- > We need to process it for reasons of substantial public interest as defined in legislation
- > We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- > We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- > We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- > We have obtained your consent to use it in a specific way
- > We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- > The data concerned has already been made manifestly public by you
- > We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- > We need to process it for reasons of substantial public interest as defined in legislation

# 5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- > Government departments or agencies
- > Police forces, courts, tribunals

#### 6. How we store this data

We keep personal information about you while you volunteer at our school. We may also keep it beyond your work at our school if this is necessary. Our record retention schedule sets out how long we keep information about governors/trustees and other volunteers.

The school uses the Information and Records Management Society's toolkit for schools as our record retention schedule. A copy of the record retention schedule can be obtained by emailing kateforeman@newlandsgirls.co.uk.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

#### 7. Who we share data with

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK protection law), we may share personal information about you with:

- ➤ Our local authority, RBWM to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- > Government departments or agencies such as the Department of Education to meet our legal obligations and to fulfil our official function as as school.
- > Our regulator, Ofsted, to meet our legal duties.
- > Educators and examining bodies to enable us to fulfil our official function as a school

- > Suppliers and service providers eg. Accent Catering Services, PiXL so that we can provide the services we have contracted them for
- > Financial organisations where permission has been given eg. epayment systems for catering and school trips
- > Central and local government in order to fulfil our official function as a school
- > Our auditors in order to fulfil our legal obligations
- > Health and social welfare organisations to fulfil our legal duties and ensure the vital interests o our pupils
- > Professional advisers and consultants so that they can provide the services they have been contracted for in the interests of the school
- > Police forces, courts, tribunals in order to comply with our legal obligations

### 7.1 Transferring data internationally

We may share personal information about you with international third parties outside of the UK, where different data protection law applies, eg. to facilitate international school trips.

Where we transfer your personal data to another country we will follow UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

## 8. Your rights

## 8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- > Give you a description of it
- > Tell you why we are holding and processing it, and how long we will keep it for
- > Explain where we got it from, if not from you
- > Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- > Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

#### 8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- > Object to our use of your personal data
- > Prevent your data being used to send direct marketing
- ➤ Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)

- In certain circumstances, have inaccurate personal data corrected
- > In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- > Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- > In certain circumstances, be notified of a data breach
- > Make a complaint to the Information Commissioner's Office
- > Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

# 9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

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

#### 10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Our data protection officer is:

➤ Turn It On Limited who can be contacted by email <a href="mailto:dpo@turniton.co.uk">dpo@turniton.co.uk</a> or by phone 01865 597620 option 3.

However, our data protection lead has day-to-day responsibility for data protection issues in our school.

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

> Kate Foreman – email kateforeman@newlandsgirls.co.uk