

WOLVERHAMPTON GRAMMAR SCHOOL

DATA PROTECTION POLICY (STUDENT AND PARENTS)

This policy is intended to provide information about how the school will use (or "process") personal data about individuals including current, past and prospective students; and their parents, carers or guardians (referred to in this policy as "parents").

It applies in addition to the school's terms and conditions, and any other information the school may provide about a particular use of personal data, including e.g. the school's policy on taking, storing and using images of children.

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with the school's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

Responsibility for Data Protection

In accordance with the Data Protection Act 1998 ('the Act'), the school has notified the Information Commissioner's Office of its processing activities. The school's ICO registration number is ZA018928 and its registered address is Compton Road, Wolverhampton WV3 9RB.

The school has appointed the Bursar as Data Protection Officer ("DPO") who will endeavour to ensure that all personal data is processed in compliance with this policy and the Act.

Types of Personal Data Processed by the School

The school may process a wide range of personal data about individuals including current, past and prospective students and their parents as part of its operation, including by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to the school;
- past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- references given or received by the school about students, and information provided by previous educational establishments and/or other professionals or organisations working with students;
- images, audio or video content of students (and occasionally other individuals including alumni) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images of children); and
- biometric data, specifically fingerprint scanning;
- Generally, the school receives personal data from the individual directly (or, in the case of students, from parents). However in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual), or collected from publicly available resources.

- The school may, from time to time, need to process "sensitive personal data" regarding individuals. Sensitive personal data includes information about an individual's physical or mental health, race or ethnic origin, political or religious beliefs, sex life, trade union membership or criminal records and proceedings. Sensitive personal data is entitled to special protection under the Act, and will only be processed by the school with the explicit consent of the appropriate individual, or as otherwise permitted by the Act.

Use of Personal Data by the School

The school will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, including as follows:

- For the purposes of student selection and to confirm the identity of prospective students and their parents;
- To provide education services (including SEN), career services, and extra-curricular activities to students; monitoring students' progress and educational needs; and maintaining relationships with alumni and the School community;
- For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the school's performance;
- To give and receive information and references about past, current and prospective students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students;
- To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the school;
- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of School trips;
- To monitor use of the school's IT and communications systems in accordance with the school's IT: acceptable use policy;
- To make use of photographic images of pupils and alumni in school publications, and other such content including audio and video materials on the school website and on the school's social media channels in accordance with the School's policy on taking, storing and using images of children;
- To use biometric data for the purpose of improved security on the school site through a biometric door access control system and also for use in the school's cashless catering system.
- For security purposes, and for regulatory and legal purposes (for example safeguarding and health and safety) and to comply with its legal obligations; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the School.

Keeping in Touch and Supporting the School

The school will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, including by sending updates and newsletters, by email, by post and other networking service including social media and school CRM systems etc. Unless the relevant individual objects, the school may also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Friends of the Junior and Senior School and the Old Wulfrunians Association;
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School;
- Collect information from publicly available sources about parents' and former students' occupation and activities, in order to maximise the school's fundraising potential
- Should you wish to limit or object to any such use, or would like further information about them, please contact the DPO in writing.

Biometric Data

Biometric data is collected and stored for use in the door access control system and the cashless catering system and is only processed for the purposes for which it was obtained, and which have been notified to student's parents or guardians, and it is not unlawfully disclosed to third parties. In accordance with The Protection of Freedoms Act 2012, the school notifies every student's parents and/or guardians of its practice of collecting and processing student's biometric data as part of an automated biometric integrated recognition system, and obtains written parent consent to that use from at least one parent or legal guardian. Parents may withdraw their consent in writing at any time. Students may also opt out of the use of their own biometric information at any time.

Notification sent to parents and/or legal guardians informs them fully of the school's reasons for collecting and processing students' biometric data and includes full details of the biometric data to be collected, its intended use, and parents' and students' right to opt out of the school's biometric recognition system. In addition, further information is provided to students by school staff about the biometric system when they join the school. Those who opt out will be provided with details of alternative arrangements to access the relevant school services.

The automated recognition software which the school uses for the purposes of processing biometric data turns the student's fingerprint into a mathematical algorithm. The image of the finger print itself is then deleted meaning that the information which is stored cannot be used to recreate the original image of the fingerprint.

Student biometric data will be deleted when the student leaves the school, or if for some other reason he/she ceases to use the biometric system.

If parents or student have any questions about the school's collection and use of biometric information, they should contact the school's nominated DPO.

Rights of Access to Personal Data ("Subject Access Request")

Individuals have the right under the Act access to personal data about them held by the school, subject to certain exemptions and limitations set out in the Act. Any individual wishing to access their personal data should put their request in writing to the DPO.

The school will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within statutory time-limits. The school may charge an administration fee of up to £10 for providing this information.

You should be aware that certain data is exempt from the right of access under the Act. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The school is also not required to disclose any student examination scripts

(though examiners' comments may fall to be disclosed), nor any reference given by the school for the purposes of the education, training or employment of any individual.

Students can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. Students aged 12 or over are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. All subject access requests from students will therefore be considered on a case by case basis.

A person with parental responsibility will generally be expected to make a subject access request on behalf of younger students. A student of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Whose Rights

The rights under the Act belong to the individual to whom the data relates. However, the school will in most cases rely on parental consent to process personal data relating to students (if consent is required under the Act) unless, given the nature of the processing in question, and the student's age and understanding, it is more appropriate to rely on the student's consent. Parents should be aware that in such situations they may not be consulted.

In general, the school will assume that students consent to 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 the student's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

However, where a student 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 will 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 student or other students.

Students are required to respect the personal data and privacy of others, and to comply with the School's IT: acceptable use policy and the School rules.

Data Accuracy and Security

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the DPO of any changes to information held about them.

An individual has the right to request that inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the DPO in writing.

The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under the Act.

Queries and Complaints

Any comments or queries on this policy should be directed to the DPO at the main school address or by emailing bursar@wgs-sch.net.

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise the school complaints procedure and should also notify the DPO.

Please also refer to the following policies and guidance:

Privacy Notice (Students and Parents) - Staff network and website	Data Retention Guidelines – Staff network
Taking, Using and Storing of Images Policy – Staff network and website	Guidance on Biometric Recognition Systems (Students) – New Admissions Information Pack
Data Protection Policy for Staff – Employment Manual	Privacy Notice for Staff – Employment Manual
Safeguarding Policy – Staff network and website	Staff Code of Conduct – Website and Employment Manual
Subject Access Procedure and Guidelines – Staff network	Guidance on Biometric Recognition Systems (Staff) – New staff pack

Monitoring and Evaluation of this policy

The school monitors and evaluates its Data Protection Policy through the following activities:

- Record keeping of training records for staff in data protection
- Review of regulatory compliance by F&GP Committee
- Review of concerns or complaints registers by SMT and Board of Directors

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September 2017

Next Review:
May 2018