

Privacy Notice – Pupils



1. Definitions

Data controller - A controller determines the purposes and means of processing personal data. For the purposes of this Privacy Notice, Bradford Grammar School is the data controller.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person. For the purposes of this Privacy Notice the data subjects are pupils, parents and carers.

Special categories personal data - The General Data Protection Regulation (“GDPR”) refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Bradford Grammar School is an outstanding UK independent grammar school, which believes in providing every opportunity for its Junior and Senior pupils. We embrace academic, sporting and creative excellence within an aspirational, caring environment, which builds on our heritage while looking to the future. We nurture exciting and fulfilling lives shaped by our School’s traditional values and believe happiness is the key to an individual’s success. We are at ease with excellence. Our Charity registration number is 529113, and we are registered at Bradford Grammar School, Keighley Road, Bradford, BD9 4JP.

Your privacy and confidentiality are of paramount importance to us. We are committed to protecting and respecting your privacy. This statement explains when and why we collect personal information, how we use it, the conditions under which we may process it and how we keep it secure.

3. What is Personal Data?

Personal data is information which relates to an individual and from which he or she can be identified either directly or indirectly through other data which the firm has or is likely to have in its possession. These individuals are sometimes referred to as data subjects. Personal data does not include information about companies and organisations.

4. What do we hold?

We collect, hold and share such information as:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- assessment information,
- relevant medical information
- special educational needs information
- exclusions / behavioural information

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- assessment information
- relevant medical information

5. Why do we collect and use this information?

We use the pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

6. What is the lawful basis on which we will use this information?

We need to process pupil information for the following lawful reasons:

- to comply with our legal obligations
- to perform/administer any contract that we have entered into with you
- where the processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights or freedoms We believe that it is in our legitimate interests to process pupil attendance records to ensure that our safeguarding obligations are met.
- we may also process pupil information in the following situations, which are likely to be rare:
 - where we need to protect your vital interests (or someone else's vital interests)
 - where we have your consent to do so

7. How do we collect and store information from you?

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR, we will inform you whether you are required to provide certain pupil information to us or if you have a choice as to whether or not to do so.

On our website, Bradford Grammar School may use web-tracking tools to analyse the overall traffic patterns of visitors to this site. We do not correlate information regarding individual users - this information is correlated aggregately and includes breakdowns of such information as user's domain name, total visits, browser type, time of day summaries etc. This information enables us to tailor the site to give our visitors a better browsing experience.

We will store any information in accordance with our Data Protection and Data Retention policies.

8. Who do we share the information about you with?

We share pupil information with

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- the Independent Schools Inspectorate
- Teacher staff, administration support staff, school nurse, NHS on an as and when required basis
- We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so. We share pupils' data with the Department for Education (DfE) and the Independent Schools Inspectorate on a statutory basis. We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

9. Special Categories Of Data

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Information such as racial or ethnic origin, sexual orientation, religious beliefs, trade union membership, genetic or biometric data and medical information including health and sickness records requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- in limited circumstances, with your explicit written consent
- where it is needed in the public interest
- less commonly, where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

10. Information About Criminal Convictions

We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided that we do so in line with our data protection policy.

11. Your Rights

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact our Data Protection Officer who is Mr Ian Findlay, Bursar and Clerk to the Governors via dataprotection@bradfordgrammar.com or by post to the address list in point one.

If any of the information we hold is incomplete or inaccurate, please tell us by contacting us at dataprotection@bradfordgrammar.com and we will correct it. We will endeavour to provide you with requested information within one month. We can impose a charge for this information if the request is manifestly unfounded or excessive. If we do refuse a request, we will advise you accordingly within one month. If this eventuality did arise you have the right to complain in accordance with our complaints procedure. In addition, without prejudice you have the right to lodge a complaint direct to the Information Commissioner's Office if you have any concerns in relation to our information rights practices.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of data protection legislation

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

12. Use And Storage Of Your Information Overseas

Your information may be transferred to, stored and processed outside the European Economic Area (EEA). We will not transfer your information outside the EEA unless it is to a country which is considered to have equivalent data protection laws or where we have taken all reasonable steps to ensure the firm has suitable standards in place to protect your information. Firefly, Heritage Library Software and Business Objectives within iTrent confirm that they may transfer personal data of EEA data subjects to outside of the EEA. Please refer to their statements which can be found at <https://fireflylearning.com/privacy-policy-firefly-app-and-website> <https://isoxford.com/legal> and <https://www.mhr.co.uk/privacy-policy/> respectively.

13. Changes to our Privacy Policy

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We may change this Policy from time to time. Any changes made to the policy will be clearly detailed within this section. This Policy was last updated in May 2018 to be GDPR compliant.

14. Website Third Party Links

Our website may contain links to other websites run by other organisations. This Privacy Policy applies only to our website, so we encourage you to read the privacy statements on any other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. We do not endorse the content of any external sites and we are not responsible or liable, directly or indirectly, for any loss however caused to you by your use of any external site.

15. Miscellaneous

The information on this website is for residents of the UK only. These Terms shall be governed by and construed in accordance with English law and the English courts shall have jurisdiction over any disputes between us.

16. Contact Us

Any questions regarding this Policy and our privacy practices should be sent via dataprotection@bradfordgrammar.com.

Reviewed by Lupton Fawcett 23 May 2018

Version 1